

Joseph Glonek  
August 29, 2025

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
Civil Action No. 2:25-cv-14047-DMM

GEM PRODUCTS, LLC,	)	
	)	
	)	
Plaintiff,	)	
	)	VIDEOTAPED
v.	)	DEPOSITION OF:
	)	
	)	JOSEPH GLONEK
RUPP MARINE, INC.,	)	
	)	
	)	
Defendant.	)	
_____	)	



TRANSCRIPT of the stenographic notes of  
the proceedings in the above-entitled matter, as  
taken by and before SANDRA A. ROBERTSON, a Certified  
Court Reporter and Notary Public of the State of New  
Jersey, held at The Viking Yacht Company, Inc., 5738  
US Route 9, New Gretna, New Jersey, on August 29,  
2025, commencing at 8:50 a.m.

Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 2</p> <p>1 A P P E A R A N C E S:</p> <p>2</p> <p>3 TAFT STETTINIUS &amp; HOLLISTER, LLP</p> <p>4 BY: WILLIAM BROMAN, ESQUIRE</p> <p>5 27777 Franklin Road</p> <p>6 Suite 2500</p> <p>7 Southfield, Missouri 48034</p> <p>8 (248) 727-1571</p> <p>9 wbroman@taftlaw.com</p> <p>10 Attorneys for the Plaintiff</p> <p>11 GEM Products, LLC</p> <p>12</p> <p>13 MCHALE &amp; SLAVIN, PA</p> <p>14 BY: ANDREW LOCKTON, ESQUIRE</p> <p>15 EDWARD MCHALE, ESQUIRE</p> <p>16 2855 PGA Boulevard</p> <p>17 Palm Beach Gardens, Florida 33410</p> <p>18 (561) 625-6575</p> <p>19 alockton@mchaleslavin.com</p> <p>20 Attorneys for the Defendant</p> <p>21 Rupp Marine, Inc.</p> <p>22</p> <p>23 VIKING GROUP</p> <p>24 BY: CHRISTOPHER S. LAM, ESQUIRE</p> <p>25 771 Cuthbert Boulevard</p> <p>4 Executive Campus, Suite 100</p> <p>Cherry Hill, New Jersey 08002</p> <p>(215) 913-4944</p> <p>clam@vikinggroup.us</p> <p>Attorneys for the Deponent</p> <p>Viking Yacht Company</p> <p>Also Appearing:</p> <p>ALEX HATOFF, Videographer and Technician</p> <p>RON KARPANTY</p>	<p style="text-align: right;">Page 4</p> <p>1 THE VIDEOGRAPHER: Good morning. We</p> <p>2 are on the record at 8:50 a.m. on August 29, 2025.</p> <p>3 Audio and video recording will take place until all</p> <p>4 parties agree to go off the record. Please note</p> <p>5 that the microphones are sensitive and may pick up</p> <p>6 whispering and private conversations.</p> <p>7 This is the video-recorded proceeding</p> <p>8 of Joseph Glonek in the matter of GEM Products, LLC</p> <p>9 versus Rupp Marine, Inc. filed in the United States</p> <p>10 District Court for the District of Florida. This</p> <p>11 proceeding is being held at Viking Yacht Company,</p> <p>12 Inc. located at 5738 US 9, New Gretna, New Jersey</p> <p>13 08224.</p> <p>14 My name is Alex Hatoff, and I am the</p> <p>15 videographer on behalf of U.S. Legal Support. I am</p> <p>16 not related to any party in this action nor am I</p> <p>17 financially interested in the outcome. The court</p> <p>18 reporter is Sandra Robertson on behalf of U.S. Legal</p> <p>19 Support.</p> <p>20 And would counsel please state their</p> <p>21 appearances for the record at this time, after which</p> <p>22 the court reporter will enter the statement for</p> <p>23 remote proceedings into the record and swear in the</p> <p>24 witness.</p> <p>25 MR. BROMAN: Will Broman on behalf of</p>
<p style="text-align: right;">Page 3</p> <p>1 INDEX</p> <p>2 WITNESS: PAGE:</p> <p>3 JOSEPH GLONEK</p> <p>4 By MR. BROMAN 5</p> <p>5 *****</p> <p>6</p> <p>7 216 Document Rupp 00001 23</p> <p>8 *****</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 GEM Products, LLC from Taft, Stettinius &amp; Hollister,</p> <p>2 LLC.</p> <p>3 MR. LOCKTON: Andrew Lockton from</p> <p>4 McHale &amp; Slavin on behalf of Rupp Marine, Inc. I am</p> <p>5 joined by Edward McHale from my firm, and we also</p> <p>6 have for the defendant, Rupp Marine, Inc. Mr. Ron</p> <p>7 Karpanty.</p> <p>8 MR. LAM: Chris Lam, general counsel</p> <p>9 for Viking Yacht Company and Palm Beach Towers.</p> <p>10 JOSEPH GLONEK,</p> <p>11 after having been duly sworn, testified as follows:</p> <p>12 EXAMINATION</p> <p>13 BY MR. BROMAN:</p> <p>14 Q. Good morning, Mr. Glonek. Have you</p> <p>15 ever had your deposition taken before?</p> <p>16 A. I have not.</p> <p>17 Q. Have you ever appeared in court?</p> <p>18 A. Yes.</p> <p>19 Q. Have you testified in court?</p> <p>20 A. No.</p> <p>21 Q. Okay. Today's deposition is being</p> <p>22 taken down by our court reporter, who is sitting to</p> <p>23 your right. She will record every word that is</p> <p>24 said. She cannot record head nods, hand gestures,</p> <p>25 nuh-uh's, uh-huh's. So there may be times when you</p>

Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 6</p> <p>1 make some sort of a gesture or nonverbal 2 communication. I will just ask you to clarify or 3 she may ask you to clarify for the record. Is that 4 fair?</p> <p>5 A. Yes.</p> <p>6 Q. Because she is doing her best, she is 7 very good at her job, but when you and I talk over 8 each other, it can be very difficult for her.</p> <p>9 A. Right.</p> <p>10 Q. So I will try not to interrupt your 11 answer. I would ask that you try not to interrupt 12 my question.</p> <p>13 A. Okay.</p> <p>14 Q. You may hear objections from Mr. 15 Lockton or from Mr. Lam. If you hear those 16 objections, you still have the answer the question. 17 Understood?</p> <p>18 A. Yep.</p> <p>19 Q. On occasion I may ask you a question 20 that I don't state very well or for some other 21 reason you don't understand it. If you don't 22 understand the question, I would just ask that you 23 not answer the question. Is that fair?</p> <p>24 A. Yes.</p> <p>25 Q. If you do answer the question, I will</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. What do you know about GEM's patent 2 regarding pulleys?</p> <p>3 A. Something about how a pulley mounts 4 on an outrigger. That's about all I know. Can't be 5 hard mounted or something like that. I don't know 6 the specifics.</p> <p>7 Q. When you say "hard mounted," what do 8 you mean by that?</p> <p>9 A. Can't be bolted directly to, I guess 10 would be the best way to say it.</p> <p>11 Q. So your understanding of GEM's patent 12 is that a pulley cannot be directly bolted to an 13 outrigger?</p> <p>14 A. I don't know the specifics of it. 15 That's just what I have heard through the grapevine 16 of our industry.</p> <p>17 Q. Who have you heard these things from?</p> <p>18 A. Drew McDowell said something to me 19 about it. That's why we had different pieces come 20 in. And also Matthew Bridgewater had said something 21 to me.</p> <p>22 Q. What did Drew McDowell say to you?</p> <p>23 A. That Rupp had changed design -- 24 MR. LOCKTON: Objection.</p> <p>25 A. -- and they had to add a piece to the</p>
<p style="text-align: right;">Page 7</p> <p>1 assume that you understood the question as I 2 intended it. Is that fair?</p> <p>3 A. Yes.</p> <p>4 Q. If I repeat a question or phrase it 5 in a different way even if you've given an answer, 6 I'm only doing that for clarity of the record. 7 Perhaps I didn't understand your answer. I am not 8 trying to be argumentative with you or put you, you 9 know, in a tough spot. So just understand that.</p> <p>10 Before we begin today, is there any 11 reason that you can't testify truthfully today?</p> <p>12 A. No.</p> <p>13 Q. Okay. Do you have any understanding 14 of why you are here today?</p> <p>15 A. A vague idea.</p> <p>16 Q. What is your vague idea?</p> <p>17 A. Something about GEM has a patent with 18 how pulleys are mounted. I don't know all the 19 details of it.</p> <p>20 Q. Do you know the parties of the case?</p> <p>21 A. Yeah, GEM Products and Rupp Marine.</p> <p>22 Q. And you understand that GEM Products 23 has some sort of a patent on pulleys?</p> <p>24 A. Some kind of idea about that. I 25 don't know the specifics of it.</p>	<p style="text-align: right;">Page 9</p> <p>1 pulley system.</p> <p>2 Q. When did Drew make these comments to 3 you?</p> <p>4 A. I have no idea. That was a while ago 5 when we first started doing this. It's probably 6 been a couple years. I don't know.</p> <p>7 Q. When you say when you first started 8 doing this, what is the "this" that you're referring 9 to?</p> <p>10 A. When we assembled the outriggers 11 there was a new piece that came in with the 12 outriggers in the kit. I didn't know what it was so 13 I questioned it. Drew informed me that's what has 14 to go on the outrigger now.</p> <p>15 Q. What is this new piece?</p> <p>16 A. It was some kind of little swivel 17 piece that went in between the outrigger and the 18 pulley.</p> <p>19 Q. Do you still install that?</p> <p>20 A. Yes.</p> <p>21 Q. What does it look like?</p> <p>22 A. It's probably about an inch long. It 23 has a stud on one end, threads on the other end. It 24 has a swivel in the middle, like a little ball 25 swivel so it can rotate.</p>



Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 10</p> <p>1 Q. Has anybody else talked to you about</p> <p>2 this ball swivel?</p> <p>3 A. No.</p> <p>4 Q. Just Drew McDowell?</p> <p>5 A. Yeah.</p> <p>6 Q. And would you say that Drew mentioned</p> <p>7 this to you more than two years ago?</p> <p>8 A. Yeah.</p> <p>9 Q. More than five years ago?</p> <p>10 A. I honestly don't remember when we</p> <p>11 started doing that to be perfectly honest with you.</p> <p>12 Q. Was it pre-COVID, post-COVID?</p> <p>13 A. It might have been pre.</p> <p>14 Q. Did Drew tell you why Rupp began</p> <p>15 including this new one inch piece?</p> <p>16 A. Just a brief statement of there was a</p> <p>17 patent that came out or something and that's what</p> <p>18 they have to do now. We never really went into</p> <p>19 depth about it.</p> <p>20 Q. Before this one inch piece was being</p> <p>21 used, how did you install Rupp's pulleys on an</p> <p>22 outrigger?</p> <p>23 A. There is a bolt that goes through and</p> <p>24 you would thread the pulley on.</p> <p>25 Q. Through the tube of the outrigger?</p>	<p style="text-align: right;">Page 12</p> <p>1 on the ball swivel?</p> <p>2 A. What do you mean?</p> <p>3 Q. You mentioned that the ball swivel</p> <p>4 allows the pulley to articulate, right?</p> <p>5 A. Yes.</p> <p>6 Q. Have you seen it articulate?</p> <p>7 A. Yes. You can move it around no</p> <p>8 problem.</p> <p>9 Q. Is there any advantage to the pulley</p> <p>10 being able to articulate?</p> <p>11 MR. LOCKTON: Object to form.</p> <p>12 A. I do not know.</p> <p>13 Q. Do most customers -- strike that.</p> <p>14 Do all customers have the pulleys</p> <p>15 installed with this one inch piece on it?</p> <p>16 MR. LOCKTON: Object to form.</p> <p>17 A. Do I answer?</p> <p>18 Q. Yes.</p> <p>19 A. Can you repeat it?</p> <p>20 Q. Do all customers have their pulleys</p> <p>21 installed on outriggers with this one inch piece</p> <p>22 added?</p> <p>23 MR. LOCKTON: Same objection.</p> <p>24 A. I don't know.</p> <p>25 Q. Have you installed the Rupp pulleys</p>
<p style="text-align: right;">Page 11</p> <p>1 A. Yes.</p> <p>2 Q. Does that attach at a collar?</p> <p>3 A. Yes.</p> <p>4 Q. The collar and that bolt are what</p> <p>5 holds the two tubes together to make a longer</p> <p>6 outrigger?</p> <p>7 A. Correct.</p> <p>8 Q. You mentioned that the one inch long</p> <p>9 piece has a ball swivel?</p> <p>10 A. Mm-hmm.</p> <p>11 Q. Do you know what the purpose of the</p> <p>12 ball swivel is?</p> <p>13 A. I do not.</p> <p>14 Q. Do you know how the ball swivel</p> <p>15 works?</p> <p>16 A. I do not.</p> <p>17 Q. Does the -- when you have the ball</p> <p>18 swivel piece installed, does the pulley part of the</p> <p>19 system, does that rotate in any way?</p> <p>20 A. Yes.</p> <p>21 Q. How does it rotate?</p> <p>22 A. It articulates and kind of moves side</p> <p>23 to side and up and down. You can spin it if you</p> <p>24 wanted to.</p> <p>25 Q. Have you seen the pulley articulate</p>	<p style="text-align: right;">Page 13</p> <p>1 on outriggers without that one piece since you</p> <p>2 became aware of the ball swivel piece?</p> <p>3 A. I have, yes, under the instruction of</p> <p>4 captains or crews or owners of the boat.</p> <p>5 Q. So customers will request that you</p> <p>6 install the pulleys without that one inch extension</p> <p>7 on it?</p> <p>8 A. Correct.</p> <p>9 Q. Do you know why they made that</p> <p>10 request?</p> <p>11 MR. LOCKTON: Object to form.</p> <p>12 A. Everybody has their own style of</p> <p>13 fishing and what they like to do. Some guys like</p> <p>14 different things. No, you know.</p> <p>15 Q. Based on the customers that have --</p> <p>16 that you have worked with, do most of them request</p> <p>17 that that one inch piece be removed?</p> <p>18 MR. LOCKTON: Object to form.</p> <p>19 A. I wouldn't say most.</p> <p>20 Q. Is it more than a handful?</p> <p>21 A. Yeah.</p> <p>22 MR. LOCKTON: Object to form.</p> <p>23 A. I would say maybe 50 percent of them.</p> <p>24 Q. About half of the customers that you</p> <p>25 install pulleys on their outriggers request that one</p>



Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 14</p> <p>1 inch piece gets removed?</p> <p>2 A. Yes.</p> <p>3 Q. And your understanding which came</p> <p>4 from Drew McDowell is that this one inch extension</p> <p>5 was added due to a patent issue?</p> <p>6 MR. LOCKTON: Object to form.</p> <p>7 A. That's what I was informed of, yes.</p> <p>8 Q. By Drew McDowell?</p> <p>9 A. Yes, when I questioned him about it.</p> <p>10 Q. Why did you question him about it?</p> <p>11 A. Because it was a new piece and I</p> <p>12 didn't know what it was.</p> <p>13 Q. Have you read any of the patents in</p> <p>14 this case?</p> <p>15 A. Not at all.</p> <p>16 Q. Have you looked at any of the patents</p> <p>17 this case?</p> <p>18 A. No. I wouldn't even know where to</p> <p>19 find them.</p> <p>20 Q. Have you formed any opinions as to</p> <p>21 whether Rupp's pulleys infringe on the patents in</p> <p>22 this case?</p> <p>23 A. No.</p> <p>24 Q. Have you told anybody that you</p> <p>25 believe that Rupp's pulleys did not infringe on the</p>	<p style="text-align: right;">Page 16</p> <p>1 for Gemlux?</p> <p>2 A. Yes.</p> <p>3 Q. For clarity, your understanding was</p> <p>4 not that the boat was for Matt Bridgewater's</p> <p>5 personal use or somebody else's personal use?</p> <p>6 A. It said Gemlux on the back of it, and</p> <p>7 they were all here. That's all I know. I don't</p> <p>8 know who owns the boat.</p> <p>9 Q. Were you involved in installing any</p> <p>10 outriggers on that boat?</p> <p>11 A. Absolutely.</p> <p>12 Q. What kind of outriggers did you</p> <p>13 install on that boat?</p> <p>14 A. Gemlux.</p> <p>15 Q. Was there a specific model that you</p> <p>16 installed, if you recall?</p> <p>17 A. Gulf Stream 74s or something like</p> <p>18 that I think they are called. I don't remember off</p> <p>19 the top of my head.</p> <p>20 Q. Have you ever spoken with Ron</p> <p>21 Karpanty?</p> <p>22 A. Yes.</p> <p>23 Q. When was the last time you spoke with</p> <p>24 Ron Karpanty?</p> <p>25 A. Are we including emails?</p>
<p style="text-align: right;">Page 15</p> <p>1 patents in this case?</p> <p>2 A. No.</p> <p>3 Q. Did you have a conversation with Matt</p> <p>4 Bridgewater last Friday about this case?</p> <p>5 A. Last Friday, no.</p> <p>6 Q. Last Friday, August 22nd, you did not</p> <p>7 have a conversation with Matt Bridgewater where you</p> <p>8 said to him that you believed that Rupp's pulleys</p> <p>9 did not infringe GEM's patents because of the ball</p> <p>10 swivel?</p> <p>11 A. Absolutely not.</p> <p>12 Q. When was the last time you talked to</p> <p>13 Matt Bridgewater?</p> <p>14 A. Probably when they built their 64.</p> <p>15 Let me look at my phone. I mean, he was here. I</p> <p>16 don't believe I had any contact after that. Yeah,</p> <p>17 it would be -- the last time I had contact with Matt</p> <p>18 Bridgewater would be when -- last October ish when</p> <p>19 they built their boat here.</p> <p>20 Q. When you say when they built their</p> <p>21 boat --</p> <p>22 A. When Gemlux built a Viking 64, their</p> <p>23 demo boat. I don't know the specifics of who owns</p> <p>24 it, but they were here building a boat.</p> <p>25 Q. Your understanding was the boat was</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. Any type of communication; email,</p> <p>2 text, phone call.</p> <p>3 A. This past week via email.</p> <p>4 Q. What did you discuss via email with</p> <p>5 Ron Karpanty?</p> <p>6 A. Parts that were here that needed to</p> <p>7 be shipped back to him.</p> <p>8 Q. Before that email exchange with Ron,</p> <p>9 when was the previous time that you -- going back in</p> <p>10 chronological order, when was the next time that you</p> <p>11 spoke with Ron?</p> <p>12 A. Probably a month or so prior via</p> <p>13 email. There might have been a phone call. We had</p> <p>14 an issue with a boat that I was trying to work out.</p> <p>15 Q. Have you ever spoken with Ron</p> <p>16 Karpanty about this litigation?</p> <p>17 A. No.</p> <p>18 Q. Have you ever spoken with anybody at</p> <p>19 Rupp Marine about this litigation?</p> <p>20 A. No.</p> <p>21 Q. Have you spoken to Ron or anybody at</p> <p>22 Rupp Marine about today's deposition?</p> <p>23 A. No.</p> <p>24 Q. Have you spoken to anybody at GEM</p> <p>25 Products about today's deposition?</p>

Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 18</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Who did you speak to at GEM</p> <p>3 Products about today's deposition?</p> <p>4 A. Brian Sutton.</p> <p>5 Q. Was that by phone?</p> <p>6 A. By phone, yes.</p> <p>7 Q. Can you describe what was said in</p> <p>8 that conversation?</p> <p>9 A. It was an after-work call, and I</p> <p>10 called him to let him know that I had to have a</p> <p>11 deposition because of this.</p> <p>12 Q. How long ago did you speak to Brian</p> <p>13 Sutton about this deposition?</p> <p>14 A. About a week ago.</p> <p>15 Q. What specifically did you talk about</p> <p>16 relative to the fact that you were going to have a</p> <p>17 deposition in this case?</p> <p>18 A. That was about the gist of it. We</p> <p>19 didn't really get into it.</p> <p>20 Him and I are friendly with each</p> <p>21 other. I called him. I said, "Hey, man, I have to</p> <p>22 do a deposition because there are things going on</p> <p>23 with the two companies."</p> <p>24 He had no idea about any of it. I</p> <p>25 didn't know much about it either. We didn't really</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Apart from Brian Sutton at GEM, have</p> <p>2 you spoken with anybody else at GEM about today's</p> <p>3 deposition?</p> <p>4 A. I have not.</p> <p>5 Q. Have you spoken with anybody else at</p> <p>6 GEM about this litigation?</p> <p>7 A. No.</p> <p>8 Q. Have you spoken with anybody else at</p> <p>9 GEM about the patents that may be at issue in the</p> <p>10 litigation?</p> <p>11 A. I have not.</p> <p>12 Q. Have you ever informed GEM that Rupp</p> <p>13 included this one inch extension on the swivel or</p> <p>14 with the swivel piece to evade GEM's patents?</p> <p>15 A. I'm sorry. Can you repeat that?</p> <p>16 Q. Have you ever made a comment to</p> <p>17 anybody at GEM regarding Rupp's one inch swivel</p> <p>18 piece?</p> <p>19 MR. LOCKTON: Object to form.</p> <p>20 A. Just the conversation that I had with</p> <p>21 Matthew when he had asked me about it.</p> <p>22 Q. What did -- Matthew being Matt</p> <p>23 Bridgewater?</p> <p>24 A. Yes.</p> <p>25 Q. And when was that conversation?</p>
<p style="text-align: right;">Page 19</p> <p>1 have much to talk about.</p> <p>2 Q. Did you ask him why you were being</p> <p>3 deposed?</p> <p>4 A. No.</p> <p>5 Q. Did he tell you why you were being</p> <p>6 deposed?</p> <p>7 A. No.</p> <p>8 Q. Did you express any frustration with</p> <p>9 being deposed?</p> <p>10 A. Probably slightly, yeah.</p> <p>11 Q. Do you remember what you said to</p> <p>12 express your slight frustration about being deposed?</p> <p>13 A. Off the top of my head, I do not.</p> <p>14 Q. Are you frustrated about being</p> <p>15 deposed?</p> <p>16 A. Yes.</p> <p>17 Q. Why?</p> <p>18 A. Because I don't understand who I am</p> <p>19 in this grand scheme of things.</p> <p>20 Q. Is that it?</p> <p>21 A. For the most part, yes.</p> <p>22 Q. What about for not the most part?</p> <p>23 A. I'm just a worker that puts stuff</p> <p>24 together and builds boats, so I don't understand</p> <p>25 what I have to do with any of this.</p>	<p style="text-align: right;">Page 21</p> <p>1 A. That would have been back in October</p> <p>2 when he was here with the boat.</p> <p>3 Q. Do you recall what he asked about</p> <p>4 specifically?</p> <p>5 A. He asked me -- I was building a set</p> <p>6 of Rupp outriggers, I was putting them together. He</p> <p>7 asked me how the pulleys came and if they came</p> <p>8 attached to the outrigger and I said no.</p> <p>9 Q. At what point did you talk about the</p> <p>10 one inch swivel piece?</p> <p>11 A. Because I believe I was installing</p> <p>12 one and he asked me what this was and I explained to</p> <p>13 him that that was a swivel piece that comes in</p> <p>14 there.</p> <p>15 Q. Did you explain you believed the</p> <p>16 swivel piece was included?</p> <p>17 A. Yes.</p> <p>18 Q. When you conveyed the why, what did</p> <p>19 you say to Matt Bridgewater?</p> <p>20 A. I said because apparently somebody</p> <p>21 owns a patent about how these pulleys can be mounted</p> <p>22 and this is what we have to do now. And he then</p> <p>23 informed me that I guess he owns the patent.</p> <p>24 Q. What was your reaction to that?</p> <p>25 A. I said, oh, okay.</p>



Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 22</p> <p>1 Q. Did you ask him about what patents</p> <p>2 were at issue?</p> <p>3 A. No.</p> <p>4 Q. Apart from -- did you have any</p> <p>5 conversations with Matt Bridgewater about the swivel</p> <p>6 piece on Rupp's pulleys?</p> <p>7 A. No.</p> <p>8 Q. Apart from Brian Sutton and Matt</p> <p>9 Bridgewater, have you spoken to anybody at GEM about</p> <p>10 Rupp's pulleys?</p> <p>11 A. No.</p> <p>12 Q. When you receive Rupp's pulleys, are</p> <p>13 they ever installed on the outrigger?</p> <p>14 A. No.</p> <p>15 Q. Have you ever asked Rupp if they can</p> <p>16 install the pulleys on the outrigger before they</p> <p>17 arrive at --</p> <p>18 A. No.</p> <p>19 Q. -- Palm Beach Towers?</p> <p>20 A. No, sir.</p> <p>21 Q. Is there any reason why somebody at</p> <p>22 Rupp or somebody at GEM would believe you spoke to</p> <p>23 them about asking Rupp to install the pulleys on the</p> <p>24 outrigger?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 24</p> <p>1 one inch swivel piece?</p> <p>2 A. They do not.</p> <p>3 Q. In the picture below the listing of</p> <p>4 part numbers, there is another picture of an</p> <p>5 outrigger with a pulley attached. Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. Does that pulley get attached based</p> <p>8 on what you can see with the one inch stem?</p> <p>9 A. I can't tell --</p> <p>10 MR. LOCKTON: Object to the form.</p> <p>11 Q. You can't tell in this picture?</p> <p>12 A. No. The tube is blocking it.</p> <p>13 Q. How long have you worked for Palm</p> <p>14 Beach Towers?</p> <p>15 A. Over 20 years.</p> <p>16 Q. How long have you been installing</p> <p>17 Rupp pulley clusters on Rupp outriggers?</p> <p>18 A. I don't know the answer to that</p> <p>19 question. I don't remember when they came out.</p> <p>20 Q. How many outriggers do you believe</p> <p>21 you have installed Rupp pulley clusters on? You can</p> <p>22 ballpark it.</p> <p>23 A. Sir, I have no idea.</p> <p>24 Q. Over 100?</p> <p>25 A. I would say so.</p>
<p style="text-align: right;">Page 23</p> <p>1 MR. LOCKTON: Object to form.</p> <p>2 MR. BROMAN: I am going to mark as</p> <p>3 Exhibit 216 the next exhibit. This is Rupp 00001.</p> <p>4 This has been previously marked at other</p> <p>5 depositions, but I am going to mark it new here.</p> <p>6 (Exhibit 216 Document Rupp 00001 marked for</p> <p>7 identification.)</p> <p>8 BY MR. BROMAN:</p> <p>9 Q. Mr. Glonek, have you seen a document</p> <p>10 before?</p> <p>11 A. I cannot say that I have.</p> <p>12 Q. Have you seen a document similar to</p> <p>13 this before?</p> <p>14 A. Just what's on their website. I</p> <p>15 haven't looked at their brochure recently.</p> <p>16 Q. If you can turn to page nine using</p> <p>17 the white numbers in the lower right-hand corner of</p> <p>18 the document.</p> <p>19 A. Mm-hmm.</p> <p>20 Q. In the top middle of page nine, which</p> <p>21 is also Bates numbered Rupp 000011, does the pulley</p> <p>22 clusters that you install on Rupp outriggers appear</p> <p>23 in the top middle of this page?</p> <p>24 A. Yes.</p> <p>25 Q. And do these pulley clusters show the</p>	<p style="text-align: right;">Page 25</p> <p>1 Q. Over 500?</p> <p>2 A. Probably not.</p> <p>3 Q. And having installed over between 100</p> <p>4 and 500 pulleys on Rupp outriggers you can't tell</p> <p>5 from this picture whether there is a one inch stem</p> <p>6 attaching the outrigger on the pulley cluster?</p> <p>7 A. No. The tube of the outrigger is in</p> <p>8 the way. You can't see the base of the pulley</p> <p>9 completely.</p> <p>10 Q. Have you ever received any type of</p> <p>11 gift from Matt Bridgewater?</p> <p>12 A. Define gift.</p> <p>13 Q. Any product, T-shirt, sports tickets,</p> <p>14 event tickets, fishing gear, anything for free?</p> <p>15 A. Yes.</p> <p>16 Q. What of you received for free from</p> <p>17 Matt Bridgewater?</p> <p>18 A. He --</p> <p>19 Q. I will strike that and clarify this.</p> <p>20 I am specifically asking about</p> <p>21 anything for free for your personal use.</p> <p>22 A. I don't know if it was from Matthew</p> <p>23 Bridgewater directly or Gemlux company, but yes, I</p> <p>24 have.</p> <p>25 Q. Whether it's from Matt Bridgewater</p>



Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 26</p> <p>1 personally on behalf of Gemlux or somebody else at</p> <p>2 Gemlux, what have you received from any of those</p> <p>3 entities for free for your personal use?</p> <p>4 A. Outriggers for my own boat and bases</p> <p>5 for my own boat.</p> <p>6 Q. How long ago was that?</p> <p>7 A. It's been a couple years. I would</p> <p>8 estimate three years.</p> <p>9 Q. Did you ask Matt or anybody at GEM to</p> <p>10 provide these outriggers?</p> <p>11 A. I asked to -- Matt said to me that</p> <p>12 give him a call anytime I needed anything. So when</p> <p>13 I was building my boat, I called him and said, "Can</p> <p>14 you help me out at all" or "Can I get a discount or</p> <p>15 anything?"</p> <p>16 Q. And what did he say in response?</p> <p>17 A. He said, "Don't worry, I will take</p> <p>18 care of you. Put your order in."</p> <p>19 Q. And then did he give you a discount?</p> <p>20 A. Yes, he did.</p> <p>21 Q. How much of a discount?</p> <p>22 A. I do not know the actual number for</p> <p>23 the discount.</p> <p>24 Q. Did you pay anything for those</p> <p>25 outriggers?</p>	<p style="text-align: right;">Page 28</p> <p>1 say that they are used with the outrigger?</p> <p>2 A. I guess you could say that depending</p> <p>3 on how you run the boat and fish, yes.</p> <p>4 Q. The outrigger system that you</p> <p>5 received without paying something for it, do you</p> <p>6 have any idea what the value of that product is</p> <p>7 retail?</p> <p>8 A. The poles themselves, I believe they</p> <p>9 are over \$2,000 or right around \$2,000, I think.</p> <p>10 Q. And the rest of the outrigger system,</p> <p>11 were you provided anything additional as part of</p> <p>12 that outrigger system for free?</p> <p>13 A. Just the bases that they mount to.</p> <p>14 Q. Are there any spreader bars on the</p> <p>15 outriggers that you received?</p> <p>16 A. No, sir.</p> <p>17 Q. How many halyard lines can you run on</p> <p>18 the outriggers that you received?</p> <p>19 A. I don't know. I haven't rigged them</p> <p>20 yet.</p> <p>21 Q. Why haven't you rigged them yet?</p> <p>22 A. I am not done building the boat.</p> <p>23 Q. Okay. What kind of boat are you</p> <p>24 building?</p> <p>25 A. It's a 25 foot Wellcraft walkaround.</p>
<p style="text-align: right;">Page 27</p> <p>1 A. The outriggers themselves, no. The</p> <p>2 other parts, yes.</p> <p>3 Q. What other parts of an outrigger are</p> <p>4 you thinking of that you would have paid for?</p> <p>5 A. Nothing do with outriggers. It was</p> <p>6 hinges and rod holders.</p> <p>7 Q. Are the hinges used with the</p> <p>8 outriggers?</p> <p>9 A. No.</p> <p>10 Q. What are the hinges used for?</p> <p>11 A. Hatches on a boat.</p> <p>12 Q. And the rod holders are also not used</p> <p>13 with the outriggers?</p> <p>14 A. No.</p> <p>15 Q. They hold fishing rods?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And fishing rods have a line coming</p> <p>18 off of them. It goes into the water, correct?</p> <p>19 A. Yes.</p> <p>20 Q. And that line when you're using an</p> <p>21 outrigger gets routed into a tension clip or</p> <p>22 retention device on the halyard line, correct?</p> <p>23 A. Correct.</p> <p>24 Q. So the rod holders don't get directly</p> <p>25 used with the outriggers but indirectly some might</p>	<p style="text-align: right;">Page 29</p> <p>1 Q. Is it a custom built boat --</p> <p>2 A. No.</p> <p>3 Q. -- built from the ground up?</p> <p>4 A. No. It's a boat I am restoring.</p> <p>5 It's an older boat.</p> <p>6 Q. It's a hobby project?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Have you asked Matt Bridgewater or</p> <p>9 anybody at Gemlux for any additional products?</p> <p>10 A. No.</p> <p>11 Q. Have they offered any additional</p> <p>12 products --</p> <p>13 A. I'm sorry. Let me backtrack there.</p> <p>14 I have ordered things through them for outside of</p> <p>15 work use, yes.</p> <p>16 Q. Okay. And did you pay for those</p> <p>17 things?</p> <p>18 A. Yes.</p> <p>19 Q. So the only things that have been --</p> <p>20 the only items of any value that have been provided</p> <p>21 to you at no cost are the outrigger poles and bases</p> <p>22 for your boat that you're building?</p> <p>23 A. Correct.</p> <p>24 Q. Would Matt Bridgewater's -- I will</p> <p>25 call that a gift. Is that fair to say?</p>

Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 30</p> <p>1 A. Yes.</p> <p>2 Q. Would Matt Bridgewater's gift affect</p> <p>3 your testimony today in any way?</p> <p>4 A. No.</p> <p>5 Q. Why not?</p> <p>6 A. Because it's irrelevant.</p> <p>7 Q. How is it irrelevant?</p> <p>8 A. Because I'm not taking any sides in</p> <p>9 any of this, so it doesn't change my opinion on</p> <p>10 anything because I don't have one.</p> <p>11 Q. So hypothetically speaking, if you</p> <p>12 believed that Rupp did nothing wrong, the fact that</p> <p>13 Matt Bridgewater provided you outriggers would not</p> <p>14 stop you from saying that; is that accurate?</p> <p>15 A. I don't know that that's my opinion,</p> <p>16 but --</p> <p>17 Q. If it was the fact that Matt</p> <p>18 Bridgewater provided you --</p> <p>19 A. From a hypothetical standpoint, no,</p> <p>20 it would not change my opinion on any of that.</p> <p>21 Q. And from a hypothetical standpoint,</p> <p>22 if you said or testified today that you believe that</p> <p>23 Rupp's products did infringe on GEM's patents which</p> <p>24 I understand you haven't looked at, would that</p> <p>25 testimony be influenced in any way by the gifts from</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. Why not?</p> <p>2 A. Well, because I can't afford any of</p> <p>3 the stuff made at the company.</p> <p>4 Q. Understandable.</p> <p>5 A. Because it doesn't matter to me.</p> <p>6 Q. Do you interface with customers as</p> <p>7 part of your job?</p> <p>8 A. Yes.</p> <p>9 Q. Do you make recommendations to</p> <p>10 customers about what outriggers to purchase?</p> <p>11 A. I do not.</p> <p>12 Q. How does a customer decide what</p> <p>13 outrigger to purchase?</p> <p>14 A. Typically it's the captain on the</p> <p>15 boat. 9 times out of 10 they decide what the boat</p> <p>16 gets because they have to use it. Sometimes owners</p> <p>17 want something specific and it's a case-by-case</p> <p>18 determination.</p> <p>19 Q. So is it accurate for me to say that</p> <p>20 the boat owner, captain, mate, whoever the customer</p> <p>21 of Palm Beach Towers is brings to you their list of</p> <p>22 equipment that they want installed and then you,</p> <p>23 through Palm Beach Towers, procures that equipment</p> <p>24 and installs it on the boat?</p> <p>25 A. I couldn't tell you because I don't</p>
<p style="text-align: right;">Page 31</p> <p>1 Matt Bridgewater?</p> <p>2 A. No.</p> <p>3 Q. Sorry. Just for the court reporter.</p> <p>4 A. No, it wouldn't influence anything.</p> <p>5 Q. Okay. Just for clarification, the</p> <p>6 gifts that Matt Bridgewater has provided you in no</p> <p>7 way affects your testimony today?</p> <p>8 A. No, not at all.</p> <p>9 Q. And the gifts that Matt Bridgewater</p> <p>10 has provided you in no way affects your view on this</p> <p>11 case?</p> <p>12 A. No.</p> <p>13 Q. Has anybody at GEM attempted to use</p> <p>14 this litigation to persuade you to not buy products</p> <p>15 from Rupp Marine?</p> <p>16 A. Not at all.</p> <p>17 Q. Has anybody at GEM Products or Gemlux</p> <p>18 used this litigation to persuade you to buy products</p> <p>19 from GEM?</p> <p>20 A. No.</p> <p>21 Q. Does knowledge of this litigation</p> <p>22 persuade you to buy from one company or another?</p> <p>23 A. No.</p> <p>24 MR. LOCKTON: Object to form.</p> <p>25 BY MR. BROMAN:</p>	<p style="text-align: right;">Page 33</p> <p>1 handle any of that stuff. We have office people and</p> <p>2 management that deal with that specifically. I</p> <p>3 don't deal with quotes and building. You know,</p> <p>4 getting everything together and figuring out what</p> <p>5 the customer wants, I don't deal with any of that.</p> <p>6 Q. Mr. McDowell gave a deposition</p> <p>7 yesterday. Are you aware of that?</p> <p>8 A. Yes.</p> <p>9 Q. Did you have any conversations with</p> <p>10 Mr. McDowell about that deposition?</p> <p>11 A. Yes, I did.</p> <p>12 Q. What was your conversation about</p> <p>13 that?</p> <p>14 A. He said it was grueling.</p> <p>15 Q. Any other comments?</p> <p>16 A. He said they are gonna ask you a</p> <p>17 bunch of questions and just answer truthfully.</p> <p>18 Q. Did he tell you what questions were</p> <p>19 going to be asked?</p> <p>20 A. No.</p> <p>21 Q. One thing that Mr. McDowell mentioned</p> <p>22 yesterday was something called a work order.</p> <p>23 A. Yes.</p> <p>24 Q. Are you familiar with a work order</p> <p>25 for Palm Beach Towers?</p>



Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 34</p> <p>1 A. Of course.</p> <p>2 Q. What is a work order at Palm Beach</p> <p>3 Towers?</p> <p>4 A. It is a line-by-line description of</p> <p>5 exactly what we are going to build, from what kind</p> <p>6 of pipe we are going to use, to who's wiring lights.</p> <p>7 Q. In your role either at Palm Beach</p> <p>8 Towers or perhaps through a personal connection with</p> <p>9 a customer, do you have any influence over what is</p> <p>10 listed on that work order?</p> <p>11 A. I do not.</p> <p>12 Q. Is it accurate to say that you</p> <p>13 receive the work order, you receive the parts and</p> <p>14 based on the parts that you have and the work order</p> <p>15 that you have, you install those parts on the boat?</p> <p>16 A. That's correct.</p> <p>17 Q. Does anybody -- strike that.</p> <p>18 Does any customer ask for your</p> <p>19 opinion of what outriggers to install on a boat?</p> <p>20 A. No.</p> <p>21 Q. Have you ever given an opinion to a</p> <p>22 customer of what outriggers they should be</p> <p>23 installing on their boat?</p> <p>24 A. No.</p> <p>25 Q. You mentioned that your boat is a</p>	<p style="text-align: right;">Page 36</p> <p>1 paraphrasing.</p> <p>2 A. Yes.</p> <p>3 Q. The products that you're installing</p> <p>4 here at Palm Beach Towers, are those the same types</p> <p>5 of outriggers that you receive from Matt</p> <p>6 Bridgewater?</p> <p>7 A. No.</p> <p>8 Q. Why not?</p> <p>9 A. They are a lower model that I have.</p> <p>10 Q. Okay. Is the model that you have</p> <p>11 specific for your walkaround type boat?</p> <p>12 A. They are universal I would say.</p> <p>13 Q. I should say not specific to your</p> <p>14 specific make and model of boat, but a walkaround</p> <p>15 boat is a type of boat, correct?</p> <p>16 A. Correct.</p> <p>17 Q. Is it synonymous with a center</p> <p>18 console boat?</p> <p>19 A. No, because a walkaround has a small</p> <p>20 cabin whereas a center console generally doesn't.</p> <p>21 Q. Are the outriggers that were given to</p> <p>22 you by Matt Bridgewater a type used predominantly on</p> <p>23 walkaround boats and smaller boats?</p> <p>24 A. Yes.</p> <p>25 Q. Do the outriggers that you receive</p>
<p style="text-align: right;">Page 35</p> <p>1 walkaround?</p> <p>2 A. Yes, sir.</p> <p>3 Q. What is a walkaround style boat?</p> <p>4 A. What does that have to do with this?</p> <p>5 Q. I am asking the questions, sir.</p> <p>6 A. It has a cabin and a driving areas</p> <p>7 that you can -- there is a path around it that you</p> <p>8 can walk around.</p> <p>9 Q. I look out in the harbor here and I</p> <p>10 see the big Viking boats that have the larger</p> <p>11 sleeping areas and things like that. Does the</p> <p>12 walkaround boat that you're working on have that?</p> <p>13 A. No. It's much smaller.</p> <p>14 Q. Where do the outriggers mount when</p> <p>15 you eventually do mount them to your walkaround</p> <p>16 boat?</p> <p>17 A. On top of my hardtop.</p> <p>18 Q. So if I am looking at a boat from the</p> <p>19 side, is the hardtop kind of in the center popping</p> <p>20 out of the middle of the boat?</p> <p>21 A. More towards the front. Over where</p> <p>22 you're driving. It will be mounted up on top of</p> <p>23 that.</p> <p>24 Q. You mentioned that the products from</p> <p>25 GEM and Rupp are rather expensive. I am</p>	<p style="text-align: right;">Page 37</p> <p>1 from Matt Bridgewater have pulleys attached to them?</p> <p>2 Will they have pulleys attached to them?</p> <p>3 A. They have internal rollers.</p> <p>4 Q. And the internal rollers on those</p> <p>5 outriggers are what you root your halyard line</p> <p>6 through?</p> <p>7 A. That's correct.</p> <p>8 Q. Have you fished on any boats that use</p> <p>9 Rupp outriggers?</p> <p>10 A. Yes.</p> <p>11 Q. Have you fished on any boats that use</p> <p>12 Rupp outriggers and Rupp's pulley clusters?</p> <p>13 A. Yes.</p> <p>14 Q. To the best of your knowledge, when</p> <p>15 you fished with Rupp outriggers and Rupp pulley</p> <p>16 clusters, are those pulley clusters attached to the</p> <p>17 outriggers with an one inch stem?</p> <p>18 A. I do not know.</p> <p>19 Q. When you are fishing on -- how many</p> <p>20 boats have you fished on that use Rupp outriggers</p> <p>21 and Rupp pulley clusters?</p> <p>22 A. There's been a bunch over the years.</p> <p>23 Q. I will ask you generally about -- my</p> <p>24 next questions are general in nature.</p> <p>25 A. Okay.</p>



Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 38</p> <p>1 Q. If there is some specific detail that</p> <p>2 I misstate or is not applicable, please let me know.</p> <p>3 A. Okay.</p> <p>4 Q. Generally speaking, are the boats</p> <p>5 that you fished on with Rupp outriggers and Rupp</p> <p>6 pulley clusters, do those have multiple pulley</p> <p>7 clusters?</p> <p>8 MR. LOCKTON: Object to form.</p> <p>9 A. Like on one outrigger?</p> <p>10 Q. Yes, going inboard to outboard.</p> <p>11 A. Yes.</p> <p>12 Q. And do those -- each of those pulley</p> <p>13 clusters that are mounted on the outrigger are some</p> <p>14 of them triple pulley clusters?</p> <p>15 A. Correct.</p> <p>16 Q. Some of them might be double pulley</p> <p>17 clusters?</p> <p>18 A. Yes.</p> <p>19 Q. And some of them are single pulley</p> <p>20 clusters?</p> <p>21 A. Yes.</p> <p>22 Q. Do you have a specific boat in mind</p> <p>23 that you are thinking of when we are talking about</p> <p>24 these things even though we are talking about them</p> <p>25 generally?</p>	<p style="text-align: right;">Page 40</p> <p>1 fact tone. Is that because there are three pulley</p> <p>2 clusters?</p> <p>3 A. There are three pulley clusters.</p> <p>4 That's a general way of fishing, yes.</p> <p>5 Q. If somebody has three pulley</p> <p>6 clusters, it's highly unlikely that they are going</p> <p>7 to use just one halyard line?</p> <p>8 MR. LOCKTON: Object to form.</p> <p>9 A. It depends on what you're doing and</p> <p>10 how you're fishing. Everybody is different.</p> <p>11 Q. Okay. Generally speaking, when</p> <p>12 you're on a boat that has Rupp's triple pulley</p> <p>13 clusters, are they using more than one halyard line?</p> <p>14 A. Yes.</p> <p>15 MR. LOCKTON: Object to form.</p> <p>16 BY MR. BROMAN:</p> <p>17 Q. Generally speaking, are they using</p> <p>18 more than two halyard lines?</p> <p>19 MR. LOCKTON: Object to form.</p> <p>20 A. Again, it's circumstantial and for</p> <p>21 the most part, yes.</p> <p>22 Q. On each of those halyard lines is</p> <p>23 there some sort of a mechanism to retain either a</p> <p>24 fishing line or a teaser line?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 39</p> <p>1 A. Not particularly.</p> <p>2 Q. You have fished on a boat that uses</p> <p>3 the Rupp triple pulley clusters, double pulley</p> <p>4 clusters and single pulley clusters?</p> <p>5 A. Yes, I have.</p> <p>6 Q. When you're fishing on that boat, has</p> <p>7 that fishing been in the United States?</p> <p>8 A. Yes.</p> <p>9 Q. Has it been here in New Jersey?</p> <p>10 A. Yes.</p> <p>11 Q. Do you fish anywhere else in the</p> <p>12 United States?</p> <p>13 A. Depends on if I'm travelling and I</p> <p>14 get lucky to get on a boat.</p> <p>15 Q. The majority of your fishing and when</p> <p>16 we are talking about things generally, that's</p> <p>17 occurring here in New Jersey in the United States?</p> <p>18 A. Correct.</p> <p>19 Q. So on a boat that is equipped with a</p> <p>20 triple pulley clusters, double pulley clusters,</p> <p>21 single pulley cluster setup, are you using more than</p> <p>22 one halyard line?</p> <p>23 A. Yes. There's three halyard lines</p> <p>24 going out the outrigger.</p> <p>25 Q. You say that kind of in a matter of</p>	<p style="text-align: right;">Page 41</p> <p>1 MR. LOCKTON: Object to form.</p> <p>2 Q. Could you use a halyard line with an</p> <p>3 outrigger without a mechanism to retain a fishing</p> <p>4 line or a teaser line?</p> <p>5 A. I am sure you can be creative and do</p> <p>6 something.</p> <p>7 MR. LOCKTON: Objection.</p> <p>8 BY MR. BROMAN:</p> <p>9 Q. Do you have anything in mind?</p> <p>10 A. Off the top of my head, no.</p> <p>11 Q. So going back to Exhibit 216, when I</p> <p>12 refer to these mechanisms, if we can turn to page 21</p> <p>13 and 22, the last page in the exhibit.</p> <p>14 A. Mm-hmm.</p> <p>15 Q. Top right, you have what's called an</p> <p>16 outrigger dredge pulley 40-millimeter fiddle block.</p> <p>17 Do you see that?</p> <p>18 A. Sure do.</p> <p>19 Q. And you see the outrigger teaser</p> <p>20 ring?</p> <p>21 A. Just below it, yes.</p> <p>22 Q. Are those attached to the halyard</p> <p>23 lines?</p> <p>24 A. Typically, yes.</p> <p>25 Q. And atypically where would they be</p>

Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 42</p> <p>1 attached?</p> <p>2 A. If they had them, yes, they are</p> <p>3 attached to --</p> <p>4 Q. Okay. If the boat uses these, they</p> <p>5 are going to be attached to the halyard lines.</p> <p>6 A. Correct.</p> <p>7 Q. Okay. And on the backside of that</p> <p>8 same page, which is Bates number Rupp 000024, there</p> <p>9 are three items on the left, top left column. They</p> <p>10 call them knockouts, clickers and zip clips?</p> <p>11 A. Yes.</p> <p>12 Q. Are you familiar with any of these</p> <p>13 products?</p> <p>14 A. Yes, I am.</p> <p>15 Q. And what is the purpose of these</p> <p>16 products?</p> <p>17 A. That's what you put your fishing line</p> <p>18 through when you run your line up the halyard.</p> <p>19 Q. Okay. So the knockouts, clickers,</p> <p>20 zip clips, those attach to the halyard line?</p> <p>21 A. Correct.</p> <p>22 Q. Do you use a different term for</p> <p>23 halyard lines?</p> <p>24 A. No.</p> <p>25 Q. Okay. Have you heard of the term</p>	<p style="text-align: right;">Page 44</p> <p>1 A. Yes, they do.</p> <p>2 Q. Based on your understanding, does</p> <p>3 outrigger dredge pulley and 40-millimeter pulley</p> <p>4 block mean the same thing?</p> <p>5 A. Yes.</p> <p>6 Q. I am just asking -- I am not asking</p> <p>7 you to comment on the fishing world in general.</p> <p>8 To your knowledge, they mean the same</p> <p>9 thing?</p> <p>10 A. Correct.</p> <p>11 Q. How long have you been fishing?</p> <p>12 A. My whole life. Grew up doing it.</p> <p>13 Q. So when the -- I will call it a</p> <p>14 fiddle block. When the fiddle block is attached to</p> <p>15 the halyard line, what runs through the rollers of</p> <p>16 the fiddle block?</p> <p>17 A. Typically the teaser line.</p> <p>18 Q. What is the teaser line attached to</p> <p>19 on either end?</p> <p>20 A. One end there's a reel. Somewhere on</p> <p>21 the boat and the other end there's a whatever kind</p> <p>22 of lure you're going to put in the water.</p> <p>23 Q. One end you start at a reel somewhere</p> <p>24 on the boat?</p> <p>25 A. Mm-hmm.</p>
<p style="text-align: right;">Page 43</p> <p>1 "rigger lines" being used?</p> <p>2 A. Yes.</p> <p>3 Q. Halyard line and rigger line are</p> <p>4 interchangeable?</p> <p>5 A. Yes.</p> <p>6 Q. The fishing lines run through the</p> <p>7 knockouts, clickers or zip clips, a similar product</p> <p>8 on the market?</p> <p>9 A. Correct.</p> <p>10 Q. When you catch a fish, what happens</p> <p>11 with the fishing line relative to these products?</p> <p>12 A. The tension on the line pulls it out</p> <p>13 of those clips and the line is free from the</p> <p>14 outrigger and the halyard lines and you fight the</p> <p>15 fish.</p> <p>16 Q. By fight the fish, you mean --</p> <p>17 A. Rod and reel.</p> <p>18 Q. Going back to page 21, when you've</p> <p>19 seen a fiddle block or dredge pulley attached to the</p> <p>20 halyard line --</p> <p>21 A. The fiddle block and the dredge</p> <p>22 pulley are the same --</p> <p>23 Q. They are the same. I can't tell. I</p> <p>24 have not been able to determine if people use</p> <p>25 different words for those.</p>	<p style="text-align: right;">Page 45</p> <p>1 Q. It goes through the fiddle block and</p> <p>2 goes down to the water?</p> <p>3 A. Correct.</p> <p>4 Q. How about with the teaser ring, how</p> <p>5 is that used?</p> <p>6 A. Typically, you only use one or the</p> <p>7 other.</p> <p>8 Q. Okay. So if you use a teaser ring,</p> <p>9 is it the same setup, you have a reel on the boat,</p> <p>10 line goes through the teaser ring and out to the</p> <p>11 water?</p> <p>12 A. From what I'm seen, yes. But again</p> <p>13 everybody does things different.</p> <p>14 Q. Sure. And, again, from what you've</p> <p>15 seen when the teaser ring is used, it's attached to</p> <p>16 the halyard line?</p> <p>17 A. Correct.</p> <p>18 Q. What is the purpose of a halyard line</p> <p>19 with an outrigger?</p> <p>20 MR. LOCKTON: Object to form.</p> <p>21 A. To run your lines out the outrigger</p> <p>22 so you can get them further away from the boat.</p> <p>23 Q. Meaning the fishing lines?</p> <p>24 A. Yes.</p> <p>25 Q. Are you aware that GEM Products</p>



Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 46</p> <p>1 served a subpoena for documents on Viking Yachts?</p> <p>2 A. No.</p> <p>3 Q. Okay. In the last two months, were</p> <p>4 you ever asked by Mr. Lam or somebody else at Viking</p> <p>5 Yachts or Palm Beach Towers to gather any documents</p> <p>6 that relate to Rupp Marine or GEM Products?</p> <p>7 A. No.</p> <p>8 Q. Are you aware if anybody at Palm</p> <p>9 Beach Towers was asked to gather documents?</p> <p>10 A. No.</p> <p>11 Q. When you receive an order from Rupp</p> <p>12 Marine here in Palm Beach Towers New Jersey, how do</p> <p>13 you receive that order?</p> <p>14 A. Usually multiple boxes depending on</p> <p>15 what we are getting.</p> <p>16 Q. If you order an outrigger system from</p> <p>17 Rupp Marine, how does that show up to Palm Beach</p> <p>18 Towers in New Jersey?</p> <p>19 A. Depending on what you ordered and how</p> <p>20 big they are, it's usually multiple boxes.</p> <p>21 Everything is all boxed up.</p> <p>22 Q. When you open the box --</p> <p>23 A. Completely disassembled.</p> <p>24 Q. Completely disassembled. So if we</p> <p>25 look at the first page of Exhibit 216 and maybe even</p>	<p style="text-align: right;">Page 48</p> <p>1 A. It could be anybody that works in my</p> <p>2 crew.</p> <p>3 Q. Would you have all 11 people working</p> <p>4 on one outrigger?</p> <p>5 A. Not at one time.</p> <p>6 Q. That's what I am trying to figure out</p> <p>7 how many people --</p> <p>8 A. One person at a time.</p> <p>9 Q. One person at a time. And how do you</p> <p>10 receive the pulley clusters when they are ordered in</p> <p>11 Palm Beach Towers New Jersey?</p> <p>12 A. They are in a separate box.</p> <p>13 Q. Is there any way that the pulley</p> <p>14 clusters could be attached by Rupp before they ship</p> <p>15 them to you?</p> <p>16 A. No.</p> <p>17 Q. Would it make your job easier if the</p> <p>18 pulley clusters were already attached?</p> <p>19 A. No. It would make it harder.</p> <p>20 Q. Why?</p> <p>21 A. Because then I have to take them</p> <p>22 apart to slide the other tube in.</p> <p>23 Q. When you receive an order from Rupp</p> <p>24 Marine to Palm Beach Towers New Jersey, do the boxes</p> <p>25 come with any type of instruction manual?</p>
<p style="text-align: right;">Page 47</p> <p>1 the second and third page, which is Rupp 00002 and</p> <p>2 Rupp 00 I will call it Rupp 02 and Rupp 03, this</p> <p>3 shown on these two pages is a fishing boat with</p> <p>4 outriggers extended, correct?</p> <p>5 A. Correct.</p> <p>6 Q. And there are a series of four metal</p> <p>7 cross pieces. Do you see those?</p> <p>8 A. Yes.</p> <p>9 Q. And between the metal cross pieces</p> <p>10 there's some cable or line?</p> <p>11 A. Yes.</p> <p>12 Q. Do the outriggers come to you here at</p> <p>13 Palm Beach Towers in New Jersey with those cross</p> <p>14 pieces and the cables attached?</p> <p>15 A. No.</p> <p>16 Q. Who here at Palm Beach Towers New</p> <p>17 Jersey would attach the cross pieces and cables to</p> <p>18 the outriggers?</p> <p>19 A. Anyone from me down to anybody else</p> <p>20 on my crew.</p> <p>21 Q. How many people are on your crew?</p> <p>22 A. I believe 11.</p> <p>23 Q. How many people are involved in</p> <p>24 assembling a new outrigger that you receive here at</p> <p>25 Palm Beach Towers New Jersey?</p>	<p style="text-align: right;">Page 49</p> <p>1 A. As far as what?</p> <p>2 Q. For how to assemble the outriggers.</p> <p>3 A. I believe they do.</p> <p>4 Q. Have you seen that document?</p> <p>5 A. There used to be a couple-page thing</p> <p>6 that said how to put it together. It's been a while</p> <p>7 since I put one together so I don't remember off the</p> <p>8 top of my head. Over the course of 20 years, I have</p> <p>9 seen it.</p> <p>10 Q. There was. Was there, to the best of</p> <p>11 your knowledge, did that documentation ever include</p> <p>12 instructions on how to attach a pulley cluster to</p> <p>13 the outrigger?</p> <p>14 A. I do not remember.</p> <p>15 Q. If a customer does not use a pulley</p> <p>16 cluster, how else do they root their halyard lines</p> <p>17 throughout the outrigger?</p> <p>18 A. Typically they are, instead of the</p> <p>19 bolt and pulley cluster, there is an eyebolt that</p> <p>20 goes through there. They can either run their lines</p> <p>21 through that eyebolt or they can attach different</p> <p>22 kinds of pulleys to that eyebolt.</p> <p>23 Q. How often do you install -- well, let</p> <p>24 me back up a second.</p> <p>25 You said it's been a while since you</p>



Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 50</p> <p>1 put an outrigger together?</p> <p>2 A. Yeah.</p> <p>3 Q. Is that not your role anymore?</p> <p>4 A. I am the supervisor, so I don't do as</p> <p>5 much of that stuff anymore.</p> <p>6 Q. Do you review a finished outrigger to</p> <p>7 make sure it's put together correctly?</p> <p>8 A. Yes.</p> <p>9 Q. Of the outriggers that you review</p> <p>10 after they've been completed or fully assembled, how</p> <p>11 many of those outriggers would you say on average</p> <p>12 use an eyebolt?</p> <p>13 MR. LOCKTON: Object to form.</p> <p>14 A. Probably, if I had to guess.</p> <p>15 Q. Yep.</p> <p>16 A. Maybe one set out of 20.</p> <p>17 Q. Not a lot?</p> <p>18 A. Not a lot.</p> <p>19 Q. How many of those finished outriggers</p> <p>20 use another pulley attached to the eyebolt?</p> <p>21 A. I'm sorry. What?</p> <p>22 Q. You said there were three ways for</p> <p>23 somebody to run a halyard line through -- or along</p> <p>24 the outrigger?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 52</p> <p>1 clusters?</p> <p>2 A. Correct.</p> <p>3 Q. And about one in 20, a fully</p> <p>4 assembled outriggers is using the eyebolt with the</p> <p>5 attached pulley, correct?</p> <p>6 A. That would be my guess, yes.</p> <p>7 Q. And then the other 19 use Rupp's</p> <p>8 pulley clusters?</p> <p>9 A. Yes.</p> <p>10 Q. And of the outriggers that you're</p> <p>11 assembling that use Rupp's pulley clusters, how many</p> <p>12 of those outriggers -- guessing is fine.</p> <p>13 Ballparking is fine -- how many of those outriggers</p> <p>14 use a double or triple pulley clusters as opposed to</p> <p>15 just single pulley clusters?</p> <p>16 A. Probably all of them.</p> <p>17 Q. Are you familiar with how outriggers</p> <p>18 are shipped to Palm Beach Towers Florida?</p> <p>19 A. Vaguely.</p> <p>20 Q. What is your vague familiarity with</p> <p>21 how the outriggers are shipped to Palm Beach Towers</p> <p>22 Florida?</p> <p>23 A. As far as I know, I believe they come</p> <p>24 there fully assembled. Rupp assembles them</p> <p>25 themselves and bring them complete.</p>
<p style="text-align: right;">Page 51</p> <p>1 Q. The first was directly through the</p> <p>2 eyebolt?</p> <p>3 A. Correct.</p> <p>4 Q. And you testified that maybe one out</p> <p>5 of every 20 finished outriggers has only the</p> <p>6 eyebolt.</p> <p>7 A. It's my guess.</p> <p>8 Q. The second option was attaching a</p> <p>9 pulley to the eyebolt?</p> <p>10 A. Yes.</p> <p>11 Q. How many fully assembled outriggers</p> <p>12 on average do you see that go that route where they</p> <p>13 have the pulley attached to the eyebolt?</p> <p>14 A. It would be that one out of 20 or</p> <p>15 whatever that puts the eyebolt on that's what they</p> <p>16 are going to do.</p> <p>17 Q. I will rephrase this and tell me if</p> <p>18 I'm being accurate or not.</p> <p>19 It's unlikely that a customer is</p> <p>20 going to purchase an outrigger of this size as shown</p> <p>21 on Rupp 03 and only use the eyebolts.</p> <p>22 A. It is unlikely, yes.</p> <p>23 MR. LOCKTON: Objection.</p> <p>24 Q. The most likely situation is either a</p> <p>25 pulley attached to the eyebolt or the Rupp pulley</p>	<p style="text-align: right;">Page 53</p> <p>1 Q. Is the delivery of an assembled</p> <p>2 outrigger something requested by Palm Beach Towers</p> <p>3 Florida?</p> <p>4 A. I do not know.</p> <p>5 Q. Do you know if that's a decision made</p> <p>6 by Rupp Marine?</p> <p>7 A. I have no idea.</p> <p>8 Q. Have you seen any purchase orders</p> <p>9 from Viking or Palm Beach Towers to Rupp Marine for</p> <p>10 outriggers?</p> <p>11 A. I'm sure at one point or another I</p> <p>12 have.</p> <p>13 Q. I will put in front of you</p> <p>14 Exhibit 209, which was marked yesterday.</p> <p>15 A. Okay.</p> <p>16 MR. LOCKTON: Will, can you remind me</p> <p>17 the Bates stamp for that one so I can pull it up?</p> <p>18 MR. BROMAN: Yes. This is one of the</p> <p>19 temporary -- this is not Bates stamped. This is</p> <p>20 produced by Viking the purchase order number is</p> <p>21 1-06168267.</p> <p>22 MR. LOCKTON: All right. Is it in</p> <p>23 that first set or the second set?</p> <p>24 MR. BROMAN: I believe it's in the</p> <p>25 second set.</p>

Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 54</p> <p>1 MR. LOCKTON: Okay. I'm there.</p> <p>2 BY MR. BROMAN:</p> <p>3 Q. Have you seen a document similar to</p> <p>4 this, Mr. Glonek?</p> <p>5 A. I am sure somewhere along the line I</p> <p>6 have, yes.</p> <p>7 Q. There is one item listed in the under</p> <p>8 item description. Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. And there's a quantity of one Rupp</p> <p>11 outriggers ordered.</p> <p>12 A. Okay.</p> <p>13 Q. Do you know what quantity or part</p> <p>14 number is associated with Rupp riggers?</p> <p>15 A. No.</p> <p>16 Q. Is this a single product that's being</p> <p>17 ordered?</p> <p>18 A. I can only guess. I don't know.</p> <p>19 Q. Do you know if Palm Beach Towers</p> <p>20 sends an order such that is for Rupp riggers in that</p> <p>21 single line item refers to all of the components</p> <p>22 that go with a Rupp outrigger including pulley</p> <p>23 clusters?</p> <p>24 A. It would just be an assumption. I do</p> <p>25 not know.</p>	<p style="text-align: right;">Page 56</p> <p>1 Q. So I would -- it's kind of like the</p> <p>2 trailer that I might see a bulldozer on the highway?</p> <p>3 A. Similar.</p> <p>4 Q. Not a box truck that I might --</p> <p>5 A. No.</p> <p>6 Q. When you are using that trailer, do</p> <p>7 you ever transport fully assembled outriggers to New</p> <p>8 Jersey?</p> <p>9 A. No.</p> <p>10 Q. No?</p> <p>11 A. No.</p> <p>12 Q. And when you use that trailer, it's</p> <p>13 your understanding that there's no packing slip with</p> <p>14 those boxes?</p> <p>15 A. I don't have the answer to that.</p> <p>16 Q. When a shipment arrives from Rupp</p> <p>17 Marine here in New Jersey, either on the Palm Beach</p> <p>18 Towers trailer or some other method, who is</p> <p>19 responsible for unpacking that box?</p> <p>20 A. I have a production coordinator that</p> <p>21 handles those things, shipping and receiving stuff.</p> <p>22 Q. Does this production coordinator</p> <p>23 ensure that all of the parts that were ordered have</p> <p>24 been delivered?</p> <p>25 A. He is supposed to.</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. What would your assumption be?</p> <p>2 A. We are ordering a set of outriggers</p> <p>3 and all the parts with it. I am not involved in any</p> <p>4 of that stuff. I do not know.</p> <p>5 Q. You have no involvement in the</p> <p>6 ordering?</p> <p>7 A. No.</p> <p>8 Q. When you receive a box of parts, do</p> <p>9 you receive any sort of additional documentation as</p> <p>10 to what should be in that box?</p> <p>11 A. There is usually a packing slip that</p> <p>12 comes with it -- uhmm, when they are shipped here,</p> <p>13 there is a usually a packing slip with it. When we</p> <p>14 transport them on their own, I don't know if they</p> <p>15 are a packing slip or not.</p> <p>16 Q. When you say you transport them on</p> <p>17 your own...</p> <p>18 A. We have a truck and a trailer that</p> <p>19 goes back and forth from Florida to here. Lately</p> <p>20 the outriggers boxed up have been coming on our</p> <p>21 trailer.</p> <p>22 Q. Is this a semi trailer or type of</p> <p>23 trailer --</p> <p>24 A. It's like a gooseneck flatbed trailer</p> <p>25 that we transport all our towers and parts on.</p>	<p style="text-align: right;">Page 57</p> <p>1 Q. Have you seen those types of</p> <p>2 documents from your production coordinator that they</p> <p>3 are looking at to verify what was ordered and what</p> <p>4 was delivered?</p> <p>5 A. I have not lately.</p> <p>6 Q. When was the last time you saw a</p> <p>7 document like that?</p> <p>8 A. I have no idea. It's not something</p> <p>9 that I handle on a daily basis.</p> <p>10 MR. BROMAN: Let's go ahead and go</p> <p>11 off the record. We will take about a five,</p> <p>12 10-minute break.</p> <p>13 THE VIDEOGRAPHER: Time is now 9:55</p> <p>14 a.m. We are going off the record. This ends Media</p> <p>15 Unit 1.</p> <p>16 (A break was taken.)</p> <p>17 THE VIDEOGRAPHER: The time is now</p> <p>18 10:05 a.m. We are back on the record. This begins</p> <p>19 Media Unit 2.</p> <p>20 BY MR. BROMAN:</p> <p>21 Q. Mr. Glonek, before we took our break</p> <p>22 and during the last session, I asked a lot about</p> <p>23 your relationship with GEM Products and their</p> <p>24 employees, correct?</p> <p>25 A. Yes.</p>



Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 58</p> <p>1 Q. Do you recall that? We talked about</p> <p>2 I believe it was Brian Sutton and Matt Bridgewater?</p> <p>3 A. Correct.</p> <p>4 Q. Was there anybody else at GEM that</p> <p>5 you have any sort of professional or personal</p> <p>6 relationship with?</p> <p>7 A. I mean, there's other employees there</p> <p>8 that I've worked with, yes.</p> <p>9 Q. And let's start with the employees</p> <p>10 that you've worked the most with. Who would those</p> <p>11 individuals be?</p> <p>12 A. It would be Ash -- I believe his last</p> <p>13 name is Gravely. I don't remember his last name</p> <p>14 completely. Ash, Sal and Kyle I believe his name</p> <p>15 is.</p> <p>16 Q. And are all of those relationships</p> <p>17 strictly professional?</p> <p>18 A. Yes.</p> <p>19 Q. Who at Rupp do you have any</p> <p>20 professional and personal relationships with?</p> <p>21 A. I speak with Ron and Darren Asher.</p> <p>22 Q. Who is Darren Asher?</p> <p>23 A. He is an employee of Rupp that is</p> <p>24 very knowledgeable and I usually contact when I'm</p> <p>25 having problems. I don't know what his exact role</p>	<p style="text-align: right;">Page 60</p> <p>1 Q. You have not spoken to anybody</p> <p>2 about -- at Rupp about today's deposition?</p> <p>3 A. No.</p> <p>4 Q. You have not spoken to anybody at</p> <p>5 Rupp about the patent infringement claims that GEM</p> <p>6 has made against Rupp?</p> <p>7 A. No.</p> <p>8 Q. Do you have any belief of whether</p> <p>9 Rupp's products infringe Gemlux patents or GEM</p> <p>10 Products' patents?</p> <p>11 A. No.</p> <p>12 Q. Have you been curious about this</p> <p>13 litigation at all?</p> <p>14 A. As far as what?</p> <p>15 Q. Looking into it, looking into various</p> <p>16 products.</p> <p>17 A. I am curious about what the actual</p> <p>18 patent says.</p> <p>19 Q. You have not read the patent?</p> <p>20 A. No.</p> <p>21 Q. Do you know anything about the</p> <p>22 patent?</p> <p>23 A. Just a vague idea of what we</p> <p>24 discussed earlier.</p> <p>25 Q. And I asked you about any gifts that</p>
<p style="text-align: right;">Page 59</p> <p>1 there is or title.</p> <p>2 Q. What kind of problems would you call</p> <p>3 Darren about?</p> <p>4 A. Typically something with a hydraulic</p> <p>5 unit that is not functioning properly and have to</p> <p>6 troubleshoot.</p> <p>7 Q. Have you ever asked Darren or Ron</p> <p>8 about the pulley clusters?</p> <p>9 A. No.</p> <p>10 Q. What is it that you talked to Ron</p> <p>11 about?</p> <p>12 A. Again, typically troubleshooting.</p> <p>13 Usually a hydraulic issue if we have problems.</p> <p>14 Q. Did you talk to Ron about anything</p> <p>15 else?</p> <p>16 A. With Ron it's typically only work</p> <p>17 related or, you know, outrigger related, something</p> <p>18 we have going on here.</p> <p>19 Q. Have you spoken to Ron in the last</p> <p>20 five years or so about the pulley clusters?</p> <p>21 A. No.</p> <p>22 Q. To clean up some stuff from earlier,</p> <p>23 you've not spoken to anybody at Rupp about this</p> <p>24 litigation?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 61</p> <p>1 you had received from GEM Products from Matt</p> <p>2 Bridgewater, right?</p> <p>3 A. Yes.</p> <p>4 Q. Have you received any gifts for</p> <p>5 personal use from Rupp Marine?</p> <p>6 A. No.</p> <p>7 Q. Has anybody from -- have you ever</p> <p>8 been fishing with anybody from Rupp Marine?</p> <p>9 A. No.</p> <p>10 Q. Have you ever asked Rupp Marine for</p> <p>11 any gifts for personal use?</p> <p>12 A. I've spoken with Ron about pricing</p> <p>13 for personal things for me. That's about it. Not</p> <p>14 any gifts, no.</p> <p>15 Q. And what kind of pricing has he given</p> <p>16 you for things for you?</p> <p>17 A. It's usually an employee discount</p> <p>18 pricing.</p> <p>19 Q. Do you know if Rupp provides that</p> <p>20 employee discount to anybody else?</p> <p>21 A. I have no idea.</p> <p>22 Q. Do you know if Rupp provides that</p> <p>23 employee discount to anybody else at Palm Beach</p> <p>24 Towers or Viking?</p> <p>25 A. I have no idea.</p>



Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 62</p> <p>1 Q. Has Rupp ever offered any gifts or</p> <p>2 discounts for personal use?</p> <p>3 A. Gifts, no. Ron has told me if I need</p> <p>4 anything, just call him and he'll help me out.</p> <p>5 Q. Have you taken him up on that offer?</p> <p>6 A. I believe so, yes.</p> <p>7 Q. Do you recall what products he helped</p> <p>8 you out with?</p> <p>9 A. Parts to fix friends' boats for</p> <p>10 outriggers, if they need to be changed or fixed.</p> <p>11 Q. He provided those to you at an</p> <p>12 employee discount?</p> <p>13 A. Typically.</p> <p>14 Q. Or were they for free?</p> <p>15 A. Nothing was ever for free.</p> <p>16 Q. Generally speaking, were they</p> <p>17 discount products?</p> <p>18 A. Yes.</p> <p>19 Q. When an outrigger is installed here</p> <p>20 at Palm Beach Towers in New Jersey, you install that</p> <p>21 on the boat?</p> <p>22 A. Yes.</p> <p>23 Q. And --</p> <p>24 A. If it's a Palm Beach Towers setup,</p> <p>25 yes.</p>	<p style="text-align: right;">Page 64</p> <p>1 Q. Who is responsible for running the</p> <p>2 final halyard lines?</p> <p>3 A. Whoever the crew is on the boat takes</p> <p>4 care of that.</p> <p>5 Q. The customer?</p> <p>6 A. The customer, yes.</p> <p>7 Q. Who is responsible for adding the</p> <p>8 retention devices such as fiddle blocks and clips?</p> <p>9 A. The customer.</p> <p>10 MR. LOCKTON: Object to form.</p> <p>11 Q. We talked earlier that almost all</p> <p>12 customers use either the eyebolt with a pulley</p> <p>13 attached or the pulley clusters directly attached to</p> <p>14 the outrigger, correct?</p> <p>15 A. Yes.</p> <p>16 Q. Is there a benefit to the pulley</p> <p>17 being attached directly to the outrigger?</p> <p>18 A. I don't believe so.</p> <p>19 Q. Is there a benefit to using a pulley</p> <p>20 over just the eyebolt alone?</p> <p>21 A. Yes.</p> <p>22 Q. What is that benefit?</p> <p>23 A. It's a smoother operation.</p> <p>24 Q. Do you have any understanding of why</p> <p>25 it's a smoother operation?</p>
<p style="text-align: right;">Page 63</p> <p>1 Q. What would be the difference between</p> <p>2 if it's Palm Beach Towers setup versus if it's not?</p> <p>3 A. Production, the Viking production</p> <p>4 team also installs outriggers on boats. And we</p> <p>5 install them as well. The Viking side I have</p> <p>6 nothing to do with.</p> <p>7 Q. For a production boat -- and is a</p> <p>8 production boat a new boat?</p> <p>9 A. Yes, they are all typically new</p> <p>10 boats, yes.</p> <p>11 Q. You, Joe Glonek, do not install</p> <p>12 outriggers on those production boats?</p> <p>13 A. Correct.</p> <p>14 Q. So when Palm Beach Towers installs an</p> <p>15 outrigger on a boat, specifically a Rupp outrigger,</p> <p>16 how is that outrigger set up when it's delivered to</p> <p>17 the customer? I will rephrase that question.</p> <p>18 When Palm Beach Towers installs an</p> <p>19 outrigger on a boat, the boat is then delivered to</p> <p>20 the customer, correct?</p> <p>21 A. Correct.</p> <p>22 Q. When the boat is delivered to the</p> <p>23 customer, are there halyard lines attached to the</p> <p>24 outriggers?</p> <p>25 A. We run strings through them.</p>	<p style="text-align: right;">Page 65</p> <p>1 A. It's less drag, yes.</p> <p>2 Q. Meaning the halyard lines aren't</p> <p>3 rubbing up against each other?</p> <p>4 A. Correct.</p> <p>5 Q. They are separated?</p> <p>6 A. Yes.</p> <p>7 Q. When a Rupp pulley is attached to an</p> <p>8 outrigger and there is no halyard line going through</p> <p>9 the pulley, is the pulley in a fixed orientation</p> <p>10 relative to the outrigger or is it just dangling</p> <p>11 there?</p> <p>12 A. Define "dangling there."</p> <p>13 MR. LOCKTON: Objection to form.</p> <p>14 BY MR. BROMAN:</p> <p>15 Q. If you move the outrigger around, is</p> <p>16 the pulley going to move as well? If you, if the</p> <p>17 boat bobs up and down, would be the pulley be free</p> <p>18 to move back and forth?</p> <p>19 A. There is some movement in there, yes.</p> <p>20 Q. Is it movement because it spins on an</p> <p>21 axis or does it just have free flowing movement</p> <p>22 generally?</p> <p>23 A. On that swivel piece that we spoke</p> <p>24 about earlier, they can go -- they can wiggle around</p> <p>25 and spin.</p>

Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 66</p> <p>1 Q. Okay. And on an outriggers where the</p> <p>2 pulley does not use the swivel attachment, is it</p> <p>3 just fixed to the outrigger, wouldn't move?</p> <p>4 A. Yes.</p> <p>5 Q. Is there a reason why a customer</p> <p>6 would want the pulley to swivel around?</p> <p>7 MR. LOCKTON: Object to form.</p> <p>8 A. It's all circumstantial to what, how</p> <p>9 the customer fishes and how they do things. Like I</p> <p>10 said earlier, everybody is different. Everybody</p> <p>11 likes something different. Some people like to have</p> <p>12 lines move around a little bit. Depending on the</p> <p>13 setup of the boat and how the riggers are set up on</p> <p>14 the boat. There are pros and cons with both.</p> <p>15 Q. What are some of the benefits to</p> <p>16 having the swivel?</p> <p>17 A. Depending on where the outriggers are</p> <p>18 mounted on the boat compared to where the halyard</p> <p>19 lands on top it, the pulleys will point directly at</p> <p>20 it and your lines don't chafe on anything and it's a</p> <p>21 lot smoother operation.</p> <p>22 Q. Is that specific to the inboard most</p> <p>23 pulley where the halyard goes from the halyard lock</p> <p>24 up to that first pulley?</p> <p>25 MR. LOCKTON: Object to form.</p>	<p style="text-align: right;">Page 68</p> <p>1 A. Clips we talked about earlier,</p> <p>2 mm-hmm, something along those lines, yes.</p> <p>3 Q. Is there a benefit to having multiple</p> <p>4 halyard lines on an outrigger setup?</p> <p>5 A. Yeah, you get more baits in the</p> <p>6 water.</p> <p>7 Q. Do you fish on any Viking boats,</p> <p>8 owned by Viking or Palm Beach Towers?</p> <p>9 A. No.</p> <p>10 Q. Do you fish on any demo boats?</p> <p>11 A. I have in the past. Not recently.</p> <p>12 Q. That demo boat is the Viking boat?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Do you recall what the outrigger</p> <p>15 setup was on the demo boat?</p> <p>16 A. That had Rupp's on it.</p> <p>17 Q. Did it have multiple halyard lines?</p> <p>18 A. Yes.</p> <p>19 Q. Did it have multiple clips or teaser</p> <p>20 pulleys or things like that?</p> <p>21 A. Yes.</p> <p>22 Q. And those clips and teaser pulleys</p> <p>23 were attached to the halyard lines?</p> <p>24 A. Yes.</p> <p>25 Q. And did the outriggers have pulley</p>
<p style="text-align: right;">Page 67</p> <p>1 A. I would believe so.</p> <p>2 Q. What are the negatives to having the</p> <p>3 pulley be swivel-able?</p> <p>4 A. It's just another thing that can</p> <p>5 break.</p> <p>6 Q. Can you describe for me what an</p> <p>7 outrigger as an entire system includes if you're out</p> <p>8 fishing?</p> <p>9 MR. LOCKTON: Object to form.</p> <p>10 A. Like, what parts and pieces are</p> <p>11 involved while fishing?</p> <p>12 Q. Yeah. If I'm out on a boat and I</p> <p>13 have never been fishing before and I am curious</p> <p>14 about all the different cables and lines and pulleys</p> <p>15 and all of that on an outrigger, could you describe</p> <p>16 for me what I'm seeing?</p> <p>17 A. Yes. So you have your outriggers</p> <p>18 that lay out away from the boat. And you have your</p> <p>19 lines that go up through them, your halyard lines</p> <p>20 and you attach your fishing line to it that goes in</p> <p>21 the water. The whole point of it is to get your</p> <p>22 baits further out away from the boat.</p> <p>23 Q. In order to attach the fishing line</p> <p>24 to the rigger line or the halyard line, you would</p> <p>25 need some sort of a mechanism either a clip or --</p>	<p style="text-align: right;">Page 69</p> <p>1 clusters attached to it?</p> <p>2 A. It's been probably ten years since I</p> <p>3 fished on a demo, so I don't remember.</p> <p>4 Q. Would Viking's demo boats have the</p> <p>5 latest and greatest technology?</p> <p>6 A. You could call it that.</p> <p>7 Q. What is the purpose of Viking's demo</p> <p>8 boats?</p> <p>9 A. To go show off what we build and</p> <p>10 attract customers and go to different locations and</p> <p>11 get customers on the boat so they can see how it</p> <p>12 performs.</p> <p>13 Q. Do the demo boats get used in</p> <p>14 tournaments?</p> <p>15 A. Yes.</p> <p>16 Q. Can you -- have you fished in</p> <p>17 tournaments?</p> <p>18 A. Not with the Viking demo team, but I</p> <p>19 have I have.</p> <p>20 Q. How does a Viking fishing boat work?</p> <p>21 A. As far as what?</p> <p>22 Q. How do you determine who wins a</p> <p>23 tournament?</p> <p>24 A. It can vary on multiple things. It</p> <p>25 could be whoever caught and released the most fish,</p>



Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 70</p> <p>1 who caught the biggest fish of a certain species.</p> <p>2 There are multiple different styles of tournaments.</p> <p>3 Q. When you're fishing in the tournament</p> <p>4 is the goal to catch as many fish as you can?</p> <p>5 A. Again, it depends on the tournament.</p> <p>6 Some yes, some no.</p> <p>7 Q. In a tournament where the goal is not</p> <p>8 to catch as many fish as you can, what is the goal</p> <p>9 of the tournament?</p> <p>10 A. Catch the biggest of X species.</p> <p>11 Q. So if you're trying to catch as many</p> <p>12 fish as you can, you would want as many baits in the</p> <p>13 water as you can have, right?</p> <p>14 A. To an extent.</p> <p>15 Q. To an extent. You would at</p> <p>16 least have -- you would want to have more than one</p> <p>17 halyard line for more than one lurer so you could</p> <p>18 use multiple lures or teaser lines or things like</p> <p>19 that, right?</p> <p>20 A. Correct.</p> <p>21 MR. LOCKTON: Object to form.</p> <p>22 Q. And when you're trying to catch the</p> <p>23 biggest fish, not necessarily the most fish, are you</p> <p>24 still using a multiple halyard line setup?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 72</p> <p>1 Q. You did not mention anything about</p> <p>2 the pulleys?</p> <p>3 A. I said, "I guess I have to do a</p> <p>4 deposition over this whole pulley ordeal."</p> <p>5 He said, "I didn't realize it was</p> <p>6 going that far." That was about the end of the</p> <p>7 conversation.</p> <p>8 Q. Did you say anything else other than</p> <p>9 "I am doing this deposition"?</p> <p>10 A. I don't recall an exact conversation,</p> <p>11 but that was basically the gist of it.</p> <p>12 Q. Did that conversation happen last</p> <p>13 Friday?</p> <p>14 A. I don't remember exactly what day it</p> <p>15 was.</p> <p>16 Q. Did you call Brian?</p> <p>17 A. I did.</p> <p>18 Q. Why did you call Brian?</p> <p>19 A. I was driving home and him and I have</p> <p>20 friendly conversations here and there.</p> <p>21 Q. Was the purpose of the conversation</p> <p>22 to talk about the deposition?</p> <p>23 A. I was curious if he knew anything</p> <p>24 about it.</p> <p>25 Q. Was there anything specific you were</p>
<p style="text-align: right;">Page 71</p> <p>1 Q. On these big boats which we looked at</p> <p>2 in Exhibit 216 on Rupp 02 and 03, would there be any</p> <p>3 reason to use just a single halyard line on this</p> <p>4 boat?</p> <p>5 A. I don't -- I wouldn't think so.</p> <p>6 Q. With a boat of this size you would</p> <p>7 want to use more than one halyard line?</p> <p>8 A. Typically, yes.</p> <p>9 Q. When you had your conversation with</p> <p>10 Matt Bridgewater about Rupp's pulleys, that occurred</p> <p>11 here in New Jersey?</p> <p>12 A. Yes.</p> <p>13 Q. And apart from that, there have been</p> <p>14 no other conversations with Matt Bridgewater about</p> <p>15 the pulleys?</p> <p>16 A. No.</p> <p>17 Q. Meaning that you are certain there's</p> <p>18 been no other conversations or you cannot recall any</p> <p>19 other conversations?</p> <p>20 A. I don't believe there was anything</p> <p>21 else.</p> <p>22 Q. When you spoke with GEM last week,</p> <p>23 somebody from -- I believe you said Brian Sutton is</p> <p>24 who you spoke with last week.</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 73</p> <p>1 hoping he was going to answer for you?</p> <p>2 A. No, no, because I didn't know what to</p> <p>3 expect.</p> <p>4 Q. You made no comments about the ball</p> <p>5 and swivel of Rupp's pulleys?</p> <p>6 A. No.</p> <p>7 Q. I want to make sure I have a good</p> <p>8 understanding of this. Why does a customer choose</p> <p>9 not to use the ball and swivel on their pulley</p> <p>10 cluster?</p> <p>11 MR. LOCKTON: Object to form.</p> <p>12 A. Because of the KISS method, Keep It</p> <p>13 Simple Stupid. It's one less thing that can break.</p> <p>14 Q. Do you make the decision to not use</p> <p>15 the swivel or does the customer make that decision?</p> <p>16 A. I do not make the decision.</p> <p>17 Q. What do you do with the swivels when</p> <p>18 a customer says that they don't want it?</p> <p>19 A. I ask them if they want them. If</p> <p>20 not, I believe there is a box of them sitting in my</p> <p>21 shop.</p> <p>22 Q. How many swivels are in that box?</p> <p>23 A. I have no idea.</p> <p>24 Q. Do you remove the swivels on the</p> <p>25 majority of outriggers that you add pulleys to?</p>

Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 74</p> <p>1 MR. LOCKTON: Object to form.</p> <p>2 A. Typically, no.</p> <p>3 Q. The majority of outriggers you add</p> <p>4 the pulleys to, you keep the swivels?</p> <p>5 A. Probably 50/50.</p> <p>6 Q. Why do you keep the swivels in a box?</p> <p>7 A. I don't know what else to do with</p> <p>8 them. I guess I could throw them away.</p> <p>9 Q. Has anybody told you not to throw</p> <p>10 them away?</p> <p>11 A. No.</p> <p>12 Q. When the swivels started being used</p> <p>13 with the pulleys, did you ever ask Rupp why?</p> <p>14 A. No.</p> <p>15 Q. But you did talk to Drew McDowell</p> <p>16 about it?</p> <p>17 A. Correct.</p> <p>18 Q. Do you recall if you were told there</p> <p>19 was some sort of a patent issue?</p> <p>20 A. Yes.</p> <p>21 Q. Was that conversation by phone?</p> <p>22 A. Probably.</p> <p>23 Q. How often do you go down to Palm</p> <p>24 Beach Towers in Florida?</p> <p>25 A. It's been quite some time. Not often</p>	<p style="text-align: right;">Page 76</p> <p>1 A. Typically, he answers or calls me</p> <p>2 right back, yeah.</p> <p>3 Q. Going back to Exhibit 216 on page</p> <p>4 nine, the pulley and pulley cluster diagram, this</p> <p>5 does not show -- we have talked about the outrigger</p> <p>6 image below. The pulleys that are shown above,</p> <p>7 those don't show a swivel?</p> <p>8 A. They do not.</p> <p>9 Q. And it looks, if you get real close</p> <p>10 maybe tilt your head to the side, that there is a</p> <p>11 hole at the bottom of the pulley clusters. Do you</p> <p>12 see that?</p> <p>13 A. Correct, yep.</p> <p>14 Q. And is that hole used to mount the</p> <p>15 pulley cluster directly to the outrigger with a</p> <p>16 bolt?</p> <p>17 A. That is a drilled and tapped hole</p> <p>18 that you mount it to either the swivel or the</p> <p>19 outrigger.</p> <p>20 Q. There is no extra piece -- if you</p> <p>21 want to mount it directly to the outrigger, there is</p> <p>22 no extra piece that you need. You just put the bolt</p> <p>23 through the outrigger and it screws in right to that</p> <p>24 hole?</p> <p>25 A. You can.</p>
<p style="text-align: right;">Page 75</p> <p>1 at all.</p> <p>2 Q. Have you been down there in the last</p> <p>3 year?</p> <p>4 A. No.</p> <p>5 Q. Last two years?</p> <p>6 A. On personal business, not for work.</p> <p>7 Q. When you're down there for personal</p> <p>8 business, do you visit the Palm Beach Towers Florida</p> <p>9 location?</p> <p>10 A. Sometimes.</p> <p>11 Q. Have you visited Rupp Marine's</p> <p>12 physical location?</p> <p>13 A. I have never been there.</p> <p>14 Q. Has anybody from Rupp Marine visited</p> <p>15 you here at Palm Beach Towers in New Jersey?</p> <p>16 A. I know Ron has been here that I know</p> <p>17 one time, but I wasn't here and I did not get the</p> <p>18 meeting.</p> <p>19 Q. You have never met Ron before?</p> <p>20 A. No, sir.</p> <p>21 Q. Do you have Ron's phone number?</p> <p>22 A. I believe just the office number.</p> <p>23 Q. Does Ron pick up the phone when you</p> <p>24 call him or do you have to normally leave a</p> <p>25 voicemail?</p>	<p style="text-align: right;">Page 77</p> <p>1 Q. Without the swivel, is there any</p> <p>2 extra piece that you would use?</p> <p>3 A. Aside from the bolt, no.</p> <p>4 Q. Okay. So the bolt that holds the</p> <p>5 outrigger tubes together goes directly into these</p> <p>6 pulley clusters?</p> <p>7 A. It can.</p> <p>8 Q. When you're not using the swivel</p> <p>9 piece?</p> <p>10 A. Yes.</p> <p>11 Q. So for -- to make sure that the</p> <p>12 record is clear, when you're not using the swivel</p> <p>13 piece, the bolt that connects the two pieces of the</p> <p>14 outrigger together goes directly into the holes of</p> <p>15 the bottom of the pulley cluster?</p> <p>16 A. Yes.</p> <p>17 Q. Do you have to use a different size</p> <p>18 bolt if you're going to use the swivel piece?</p> <p>19 A. No.</p> <p>20 Q. How much of the bolt extends out of</p> <p>21 the outrigger when you're gonna attach the swivel</p> <p>22 piece to it?</p> <p>23 A. If I had to guess, a half an inch.</p> <p>24 Q. That same half an inch is what allows</p> <p>25 you to screw on the pulley clusters directly to the</p>



Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 78</p> <p>1 outrigger?</p> <p>2 A. Correct.</p> <p>3 Q. Can you describe the swivel piece for</p> <p>4 me?</p> <p>5 A. It looks like a nut on one end that</p> <p>6 you can thread the bolt into, and there's two</p> <p>7 sleeves, there is a little gap between them. That's</p> <p>8 where it swivels. On top of that is a stud with a</p> <p>9 locking nut on it.</p> <p>10 Q. Does the pulley cluster attach to the</p> <p>11 stud?</p> <p>12 A. Yes.</p> <p>13 Q. If you go to Exhibit 216 on the final</p> <p>14 page, the top right column, there's something called</p> <p>15 a rigging kit. Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Do you ever receive those rigging</p> <p>18 kits as part of your box shipments from Rupp?</p> <p>19 A. No.</p> <p>20 Q. Below it, there is something called a</p> <p>21 lockup. Is this commonly referred to as a lockup?</p> <p>22 A. Yes.</p> <p>23 Q. Did you ever receive a lockup in your</p> <p>24 shipments from Rupp?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 80</p> <p>1 still use the halyard line.</p> <p>2 Q. For a different purpose?</p> <p>3 A. Yes.</p> <p>4 Q. But when you mount the teaser and</p> <p>5 dredge clamp, the reason that you're mounting that</p> <p>6 is for some other purpose and that some other</p> <p>7 purpose makes no use of the halyard line?</p> <p>8 MR. LOCKTON: Objection to form.</p> <p>9 A. No. It's --</p> <p>10 Q. I will rephrase the question.</p> <p>11 What is a teaser or dredge clamp used</p> <p>12 for?</p> <p>13 A. Pulley or anchor attachment.</p> <p>14 Q. Okay. What runs through that pulley</p> <p>15 or anchor attachment?</p> <p>16 A. Either your teaser line or your</p> <p>17 dredge pulleys attach to those clamps.</p> <p>18 Q. Your halyard line don't run through</p> <p>19 those pulleys?</p> <p>20 A. No.</p> <p>21 Q. When did you start working for Viking</p> <p>22 and/or Palm Beach Towers?</p> <p>23 A. I started with Palm Beach Towers in</p> <p>24 April of 2005.</p> <p>25 Q. How many employees did Palm Beach</p>
<p style="text-align: right;">Page 79</p> <p>1 Q. Do you receive either the rigging</p> <p>2 kits or the locking kits from Rupp perhaps outside</p> <p>3 in a box, bag, envelope?</p> <p>4 A. No.</p> <p>5 Q. Is it your understanding that the</p> <p>6 rigging kits and/or the lockups are sent directly to</p> <p>7 the customer?</p> <p>8 A. Typically, yes, they are customer</p> <p>9 supplied, yes.</p> <p>10 Q. On page 21, there is something called</p> <p>11 a teaser/dredge clamp. Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Where does the teaser and dredge</p> <p>14 clamp get mounted to the outrigger?</p> <p>15 A. In various locations on the outrigger</p> <p>16 tube. Clamps to it.</p> <p>17 Q. Does it clamp over a halyard line?</p> <p>18 A. No.</p> <p>19 Q. Could you clamp it over a halyard</p> <p>20 line and still use the halyard line?</p> <p>21 A. No.</p> <p>22 Q. So if you're using the teaser or</p> <p>23 dredge clamp, you're not using the halyard line at</p> <p>24 all?</p> <p>25 A. It's two different entities. You</p>	<p style="text-align: right;">Page 81</p> <p>1 Towers have back then, if you can recall?</p> <p>2 A. In New Jersey or total?</p> <p>3 Q. Total.</p> <p>4 A. I have no idea the answer to that</p> <p>5 question.</p> <p>6 Q. What about in New Jersey?</p> <p>7 A. There was, when I started, there was</p> <p>8 probably five to six of us here.</p> <p>9 Q. How many employees at Palm Beach</p> <p>10 Towers work in New Jersey now?</p> <p>11 A. In my shop, 11 or 12. I forget.</p> <p>12 Q. You're the supervisor?</p> <p>13 A. Correct.</p> <p>14 Q. Of those 11 or 12?</p> <p>15 A. Yes.</p> <p>16 Q. Are there any other supervisors here</p> <p>17 in New Jersey?</p> <p>18 A. We have a fiberglass crew in the</p> <p>19 back. I don't know how that's all handled as far as</p> <p>20 if they are Palm Beach Towers supervisors or if they</p> <p>21 are Viking supervisors. I am not entirely sure that</p> <p>22 have.</p> <p>23 Q. The fiberglass shop that you're</p> <p>24 referring to, do they make the hardtops that Palm</p> <p>25 Beach Towers uses?</p>

Joseph Glonek  
August 29, 2025

<p style="text-align: right;">Page 82</p> <p>1 A. Correct.</p> <p>2 Q. Does your team of 11 do the metal</p> <p>3 fabrication for the towers as well?</p> <p>4 A. Yes.</p> <p>5 Q. They do the welding?</p> <p>6 A. Yes.</p> <p>7 Q. They do all the bending and all of</p> <p>8 that associated work?</p> <p>9 A. Yes.</p> <p>10 Q. Prior to working for Palm Beach</p> <p>11 Towers, did you work anywhere else?</p> <p>12 A. Yes.</p> <p>13 Q. Where did you work before Palm Beach</p> <p>14 Towers?</p> <p>15 A. It was called PL Custom.</p> <p>16 Q. What did they do?</p> <p>17 A. Build fire rescue trucks and</p> <p>18 ambulances.</p> <p>19 Q. What did you do for PL Custom?</p> <p>20 A. I was a welder and fabricator.</p> <p>21 Q. Do you do any welding at Palm Beach</p> <p>22 Towers?</p> <p>23 A. Yes.</p> <p>24 Q. Still today?</p> <p>25 A. Not as much as I used to, but, yes.</p>	<p style="text-align: right;">Page 84</p> <p>1 A. You're talking about the physical</p> <p>2 cluster itself?</p> <p>3 Q. What we saw on page nine, is what we</p> <p>4 see on page nine the same pulley cluster that you</p> <p>5 started adding when you started adding them?</p> <p>6 A. I believe the hardware internally of</p> <p>7 them changed at one point.</p> <p>8 Q. What internal hardware do you believe</p> <p>9 changed?</p> <p>10 A. The bolt that goes through the</p> <p>11 pulleys itself.</p> <p>12 Q. So that's -- if we are looking at</p> <p>13 this image and we are looking at the center image,</p> <p>14 there are two bolts that are vertical relative to</p> <p>15 one another, you're talking about the top bolt</p> <p>16 there?</p> <p>17 A. I believe so, yes.</p> <p>18 Q. Do you know what the design was</p> <p>19 before the top bolt that was pictured here?</p> <p>20 A. If I remember, I believe it was some</p> <p>21 kind of plastic or phenolic bolt.</p> <p>22 Q. Did it change -- did these pulley</p> <p>23 clusters change in any other way apart from the</p> <p>24 stems?</p> <p>25 A. As far as I know, no.</p>
<p style="text-align: right;">Page 83</p> <p>1 Q. When you started at Palm Beach Towers</p> <p>2 in April of 2005, what was your role?</p> <p>3 A. I was hired as a welder.</p> <p>4 Q. And what was your role after being</p> <p>5 hired as a welder? Did you move up at all?</p> <p>6 A. Over time, yes.</p> <p>7 Q. What was your next role?</p> <p>8 A. I guess it would be called lead man.</p> <p>9 Q. Lead man?</p> <p>10 A. Yes.</p> <p>11 Q. And what were your responsibilities</p> <p>12 as a lead man?</p> <p>13 A. Making sure projects stayed on target</p> <p>14 for our completion dates, make sure they all got</p> <p>15 done, building projects.</p> <p>16 Q. Then after lead man, what was your</p> <p>17 next role?</p> <p>18 A. Supervisor.</p> <p>19 Q. How long have you been a supervisor</p> <p>20 at Palm Beach Towers?</p> <p>21 A. I guess officially 10 plus years I</p> <p>22 would think. I don't know.</p> <p>23 Q. Have the Rupp pulley clusters changed</p> <p>24 over your last ten years as a supervisor, apart from</p> <p>25 adding the stem?</p>	<p style="text-align: right;">Page 85</p> <p>1 Q. Have the stems changed in any way?</p> <p>2 A. I do not know.</p> <p>3 Q. The stems were introduced somewhere</p> <p>4 about five years ago?</p> <p>5 A. Maybe longer. I honestly do not</p> <p>6 remember.</p> <p>7 Q. But the stems were added to Rupp's</p> <p>8 pulley clusters based on your knowledge because of a</p> <p>9 patent issue?</p> <p>10 A. As far as I know, it is what I heard.</p> <p>11 Q. Has this litigation changed your view</p> <p>12 of Rupp Marine in any way?</p> <p>13 A. No.</p> <p>14 Q. Has this litigation changed your view</p> <p>15 of GEM Products in any way?</p> <p>16 A. No.</p> <p>17 Q. Do you intend to talk to anybody at</p> <p>18 Rupp Marine about your deposition today?</p> <p>19 A. No.</p> <p>20 Q. Do you intend to talk to anybody at</p> <p>21 GEM Products about your deposition today?</p> <p>22 A. No.</p> <p>23 Q. Is there anything that I didn't ask</p> <p>24 today that you thought I would?</p> <p>25 A. No. You went a lot further than I</p>



Joseph Glonek  
August 29, 2025

Page 86

1 thought you would.

2 MR. BROMAN: I have no further  
3 questions.

4 THE WITNESS: Okay.

5 MR. LOCKTON: Okay. We have no  
6 cross. So we would like to order a rough of the  
7 transcript and have it expedited.

8 THE VIDEOGRAPHER: Time is now 10:38  
9 a.m. This completes the videotaped deposition of  
10 Joseph Glonek.

11 (Witness excused.)

12 (Deposition concluded at 10:38 a.m.)

13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Page 87

1 CERTIFICATE

2 I, Sandra Robertson, a Notary Public and  
3 Certified Court Reporter of the State of New Jersey,  
4 do hereby certify that prior to the commencement of  
5 the examination, the witness was duly sworn by me  
6 via Zoom.

7 I DO FURTHER CERTIFY that the foregoing is a  
8 true and accurate transcript of the testimony as  
9 taken stenographically by and before me via Zoom at  
10 the time, place and on the date hereinbefore set  
11 forth, to the best of my ability.

12 I DO FURTHER CERTIFY that I am neither a  
13 relative nor employee nor attorney nor counsel of  
14 any of the parties to this action, and that I am  
15 neither a relative nor employee of such attorney or  
16 counsel, and that I am not financially interested in  
17 the action.

18  
19  
20

Sandra Robertson

21 Notary Number: 2108796  
22 CCR License Number: 30XI00209500  
23 License Expiration: 6/30/26  
24  
25

Joseph Glonek  
August 29, 2025

<b>Exhibits</b>	<b>100</b> 24:24 25:3	<b>4</b>	12:10 43:24
<b>EX 0216 Josep</b>	<b>10:05</b> 57:18	<b>40-millimeter</b> 41:16 44:3	<b>above</b> 76:6
<b>h Glonek 0829</b>	<b>10:38</b> 86:8,12	<b>5</b>	<b>Absolutely</b> 15:11 16:11
<b>25</b> 23:3,6 41:11 46:25 71:2 76:3 78:13	<b>11</b> 47:22 48:3 81:11,14 82:2	<b>50</b> 13:23	<b>accurate</b> 30:14 32:19 34:12 51:18
<b>\$</b>	<b>12</b> 81:11,14	<b>50/50</b> 74:5	<b>action</b> 4:16
<b>\$2,000</b> 28:9	<b>19</b> 52:7	<b>500</b> 25:1,4	<b>actual</b> 26:22 60:17
<b>0</b>	<b>2</b>	<b>5738</b> 4:12	<b>add</b> 8:25 73:25 74:3
<b>00</b> 47:2	<b>2</b> 57:19	<b>6</b>	<b>added</b> 12:22 14:5 85:7
<b>00001</b> 23:3,6	<b>20</b> 24:15 49:8 50:16 51:5, 14 52:3	<b>64</b> 15:14,22	<b>adding</b> 64:7 83:25 84:5
<b>000011</b> 23:21	<b>2005</b> 80:24 83:2	<b>7</b>	<b>additional</b> 28:11 29:9, 11 55:9
<b>00002</b> 47:1	<b>2025</b> 4:2	<b>74s</b> 16:17	<b>advantage</b> 12:9
<b>000024</b> 42:8	<b>209</b> 53:14	<b>8</b>	<b>affect</b> 30:2
<b>02</b> 47:2 71:2	<b>21</b> 41:12 43:18 79:10	<b>8:50</b> 4:2	<b>affects</b> 31:7,10
<b>03</b> 47:2 51:21 71:2	<b>216</b> 23:3,6 41:11 46:25 71:2 76:3 78:13	<b>9</b> 4:12 32:15	<b>afford</b> 32:2
<b>08224</b> 4:13	<b>22</b> 41:13	<b>9</b> 4:12 32:15	<b>after-work</b> 18:9
<b>1</b>	<b>22nd</b> 15:6	<b>9:55</b> 57:13	<b>ago</b> 9:4 10:7,9 18:12,14 26:6 85:4
<b>1</b> 57:15	<b>25</b> 28:25	<b>A</b>	<b>agree</b> 4:4
<b>1-06168267</b> 53:21	<b>29</b> 4:2	<b>a.m.</b> 4:2 57:14,18 86:9,12	<b>ahead</b> 57:10
<b>10</b> 32:15 83:21		<b>able</b>	<b>Alex</b> 4:14
<b>10-minute</b> 57:12			<b>allows</b> 12:4 77:24



Joseph Glonek  
August 29, 2025

<b>ambulances</b> 82:18	<b>April</b> 80:24 83:2	<b>assume</b> 7:1	<b>B</b>
<b>anchor</b> 80:13,15	<b>areas</b> 35:6,11	<b>assumption</b> 54:24 55:1	<b>back</b> 16:6 17:7,9 21:1 41:11 43:18 49:24 55:19 57:18 65:18 76:2,3 81:1,19
<b>and/or</b> 79:6 80:22	<b>argumentative</b> 7:8	<b>attach</b> 11:2 42:20 47:17 49:12, 21 67:20,23 77:21 78:10 80:17	<b>backside</b> 42:7
<b>Andrew</b> 5:3	<b>around</b> 12:7 28:9 35:7,8 65:15,24 66:6,12	<b>attached</b> 21:8 24:5,7 37:1,2,16 41:22 42:1, 3,5 43:19 44:14,18 45:15 47:14 48:14,18 50:20 51:13, 25 52:5 63:23 64:13, 17 65:7 68:23 69:1	<b>backtrack</b> 29:13
<b>answer</b> 6:11,16,23, 25 7:5,7 12:17 24:18 33:17 56:15 73:1 81:4	<b>arrive</b> 22:17	<b>attaching</b> 25:6 51:8	<b>bag</b> 79:3
<b>answers</b> 76:1	<b>arrives</b> 56:16	<b>attachment</b> 66:2 80:13, 15	<b>baits</b> 67:22 68:5 70:12
<b>anybody</b> 10:1 14:24 17:18,21,24 20:2,5,8,17 22:9 26:9 29:9 31:13, 17 34:17 46:8 47:19 48:1 58:4 59:23 60:1,4 61:7,8,20,23 74:9 75:14 85:17,20	<b>articulate</b> 11:25 12:4, 6,10	<b>attempted</b> 31:13	<b>ball</b> 9:24 10:2 11:9,12,14, 17 12:1,3 13:2 15:9 73:4,9
<b>anyone</b> 47:19	<b>articulates</b> 11:22	<b>attaching</b> 25:6 51:8	<b>ballpark</b> 24:22
<b>anytime</b> 26:12	<b>Ash</b> 58:12,14	<b>attract</b> 69:10	<b>Ballparking</b> 52:13
<b>apart</b> 20:1 22:4,8 48:22 71:13 83:24 84:23	<b>Asher</b> 58:21,22	<b>atypically</b> 41:25	<b>bars</b> 28:14
<b>apparently</b> 21:20	<b>asked</b> 20:21 21:3, 5,7,12 22:15 26:11 29:8 33:19 46:4,9 57:22 59:7 60:25 61:10	<b>Audio</b> 4:3	<b>base</b> 25:8
<b>appearances</b> 4:21	<b>asking</b> 22:23 25:20 35:5 44:6	<b>August</b> 4:2 15:6	<b>based</b> 13:15 24:7 34:14 44:2 85:8
<b>appeared</b> 5:17	<b>assemble</b> 49:2	<b>average</b> 50:11 51:12	<b>bases</b> 26:4 28:13 29:21
<b>applicable</b> 38:2	<b>assembled</b> 9:10 50:10 51:11 52:4, 24 53:1 56:7	<b>aware</b> 13:2 33:7 45:25 46:8	<b>basically</b> 72:11
	<b>assembles</b> 52:24	<b>axis</b> 65:21	<b>basis</b> 57:9
	<b>assembling</b> 47:24 52:11		<b>Bates</b> 23:21 42:8 53:17,19
	<b>associated</b> 54:14 82:8		

Joseph Glonek  
August 29, 2025

<b>Beach</b> 5:9 22:19 24:14 32:21, 23 33:25 34:2,7 36:4 46:5,9,12,17 47:13,16,25 48:11,24 52:18,21 53:2,9 54:19 56:17 61:23 62:20,24 63:2,14,18 68:8 74:24 75:8,15 80:22,23,25 81:9,20,25 82:10,13,21 83:1,20	<b>bending</b> 82:7 <b>benefit</b> 64:16,19,22 68:3 <b>benefits</b> 66:15 <b>best</b> 6:6 8:10 37:14 49:10 <b>big</b> 35:10 46:20 71:1 <b>biggest</b> 70:1,10,23 <b>bit</b> 66:12 <b>block</b> 41:16 43:19, 21 44:4,14, 16 45:1 <b>blocking</b> 24:12 <b>blocks</b> 64:8 <b>boat</b> 13:4 15:19, 21,23,24,25 16:4,8,10,13 17:14 21:2 26:4,5,13 27:11 28:3, 22,23 29:1, 4,5,22 32:15,20,24 34:15,19,23, 25 35:3,12, 16,18,20 36:11,14,15, 18 38:22 39:2,6,14,19 40:12 42:4 44:21,24 45:9,22 47:3 62:21 63:7, 8,15,19,22 64:3 65:17 66:13,14,18	67:12,18,22 68:12,15 69:11,20 71:4,6 <b>boats</b> 19:24 35:10 36:23 37:8, 11,20 38:4 62:9 63:4, 10,12 68:7, 10 69:4,8,13 71:1 <b>bobs</b> 65:17 <b>bolt</b> 10:23 11:4 49:19 76:16, 22 77:3,4, 13,18,20 78:6 84:10, 15,19,21 <b>bolted</b> 8:9,12 <b>bolts</b> 84:14 <b>bottom</b> 76:11 77:15 <b>box</b> 46:22 48:12 55:8,10 56:4,19 73:20,22 74:6 78:18 79:3 <b>boxed</b> 46:21 55:20 <b>boxes</b> 46:14,20 48:24 56:14 <b>break</b> 57:12,16,21 67:5 73:13 <b>Brian</b> 18:4,12 20:1 22:8 58:2 71:23 72:16, 18	<b>Bridgewater</b> 8:20 15:4,7, 13,18 20:23 21:19 22:5,9 25:11,17,23, 25 29:8 30:13,18 31:1,6,9 36:6,22 37:1 58:2 61:2 71:10,14 <b>Bridgewater's</b> 16:4 29:24 30:2 <b>brief</b> 10:16 <b>bring</b> 52:25 <b>brings</b> 32:21 <b>brochure</b> 23:15 <b>Broman</b> 4:25 5:13 23:2,8 31:25 40:16 41:8 53:18,24 54:2 57:10, 20 65:14 86:2 <b>build</b> 34:5 69:9 82:17 <b>building</b> 15:24 21:5 26:13 28:22, 24 29:22 33:3 83:15 <b>builds</b> 19:24 <b>built</b> 15:14,19,20, 22 29:1,3 <b>bulldozer</b> 56:2 <b>bunch</b> 33:17 37:22
--	--	---	---



Joseph Glonek  
August 29, 2025

<b>business</b> 75:6,8	<b>caught</b> 69:25 70:1	<b>clip</b> 27:21 67:25	<b>communication</b> 6:2 17:1
<b>buy</b> 31:14,18,22	<b>center</b> 35:19 36:17, 20 84:13	<b>clips</b> 42:10,20 43:7,13 64:8 68:1,19,22	<b>companies</b> 18:23
<b>C</b>	<b>certain</b> 70:1 71:17	<b>close</b> 76:9	<b>company</b> 4:11 5:9 25:23 31:22 32:3
<b>cabin</b> 35:6 36:20	<b>chafe</b> 66:20	<b>cluster</b> 25:6 39:21 49:12,16,19 73:10 76:4, 15 77:15 78:10 84:2,4	<b>compared</b> 66:18
<b>cable</b> 47:10	<b>change</b> 30:9,20 84:22,23	<b>clusters</b> 23:22,25 24:17,21 37:12,16,21 38:6,7,13, 14,17,20 39:3,4,20 40:2,3,6,13 48:10,14,18 52:1,8,11, 14,15 54:23 59:8,20 64:13 69:1 76:11 77:6, 25 83:23 84:23 85:8	<b>complete</b> 52:25
<b>cables</b> 47:14,17 67:14	<b>changed</b> 8:23 62:10 83:23 84:7,9 85:1,11,14		<b>completed</b> 50:10
<b>call</b> 17:2,13 18:9 26:12 29:25 42:10 44:13 47:2 59:2 62:4 69:6 72:16,18 75:24	<b>choose</b> 73:8		<b>completely</b> 25:9 46:23, 24 58:14
	<b>Chris</b> 5:8		<b>completes</b> 86:9
	<b>chronological</b> 17:10		<b>completion</b> 83:14
<b>called</b> 16:18 18:10, 21 26:13 33:22 41:15 78:14,20 79:10 82:15 83:8	<b>circumstantia</b> <b>l</b> 40:20 66:8		<b>components</b> 54:21
	<b>claims</b> 60:5		<b>concluded</b> 86:12
<b>calls</b> 76:1	<b>clamp</b> 79:11,14,17, 19,23 80:5, 11	<b>collar</b> 11:2,4	<b>connection</b> 34:8
<b>captain</b> 32:14,20	<b>clamps</b> 79:16 80:17	<b>column</b> 42:9 78:14	<b>connects</b> 77:13
<b>captains</b> 13:4	<b>clarification</b> 31:5	<b>come</b> 8:19 47:12 48:25 52:23	<b>cons</b> 66:14
<b>care</b> 26:18 64:4	<b>clarify</b> 6:2,3 25:19	<b>comes</b> 21:13 55:12	<b>console</b> 36:18,20
<b>case</b> 7:20 14:14, 17,22 15:1,4 18:17 31:11	<b>clarity</b> 7:6 16:3	<b>comment</b> 20:16 44:7	<b>contact</b> 15:16,17 58:24
<b>case-by-case</b> 32:17	<b>clean</b> 59:22	<b>comments</b> 9:2 33:15 73:4	<b>conversation</b> 15:3,7 18:8 20:20,25 33:12 71:9 72:7,10,12, 21 74:21
<b>catch</b> 43:10 70:4, 8,10,11,22	<b>clear</b> 77:12	<b>commonly</b> 78:21	<b>conversations</b> 4:6 22:5 33:9 71:14, 18,19 72:20
	<b>clickers</b> 42:10,19 43:7		

Joseph Glonek  
August 29, 2025

<b>conveyed</b> 21:18	<b>crews</b> 13:4	<b>defendant</b> 5:6	<b>determination</b> 32:18
<b>coordinator</b> 56:20,22 57:2	<b>cross</b> 47:7,9,13,17 86:6	<b>Define</b> 25:12 65:12	<b>determine</b> 43:24 69:22
<b>corner</b> 23:17	<b>curious</b> 60:12,17 67:13 72:23	<b>delivered</b> 56:24 57:4 63:16,19,22	<b>device</b> 27:22
<b>correct</b> 11:7 13:8 27:18,22,23 29:23 34:16 36:15,16 37:7 38:15 39:18 42:6, 21 43:9 44:10 45:3, 17 47:4,5 50:25 51:3 52:2,5 57:24 58:3 63:13, 20,21 64:14 65:4 70:20 71:25 74:17 76:13 78:2 81:13 82:1	<b>custom</b> 29:1 82:15, 19	<b>delivery</b> 53:1	<b>devices</b> 64:8
	<b>customer</b> 32:12,20 33:5 34:9, 18,22 49:15 51:19 63:17, 20,23 64:5, 6,9 66:5,9 73:8,15,18 79:7,8	<b>demo</b> 15:23 68:10, 12,15 69:3, 4,7,13,18	<b>diagram</b> 76:4
	<b>customers</b> 12:13,14,20 13:5,15,24 32:6,10 64:12 69:10, 11	<b>depending</b> 28:2 46:14, 19 66:12,17	<b>difference</b> 63:1
<b>correctly</b> 50:7		<b>depends</b> 39:13 40:9 70:5	<b>different</b> 7:5 8:19 13:14 40:10 42:22 43:25 45:13 49:21 66:10,11 67:14 69:10 70:2 77:17 79:25 80:2
<b>cost</b> 29:21	<b>D</b>	<b>deposed</b> 19:3,6,9,12, 15	<b>difficult</b> 6:8
<b>counsel</b> 4:20 5:8	<b>daily</b> 57:9	<b>deposition</b> 5:15,21 17:22,25 18:3,11,13, 17,22 20:3 33:6,10 60:2 72:4,9,22 85:18,21 86:9,12	<b>directly</b> 8:9,12 25:23 27:24 51:1 64:13,17 66:19 76:15, 21 77:5,14, 25 79:6
<b>couple</b> 9:6 26:7	<b>dangling</b> 65:10,12	<b>depositions</b> 23:5	<b>disassembled</b> 46:23,24
<b>couple-page</b> 49:5	<b>Darren</b> 58:21,22 59:3,7	<b>depth</b> 10:19	<b>discount</b> 26:14,19,21, 23 61:17,20, 23 62:12,17
<b>course</b> 34:1 49:8	<b>dates</b> 83:14	<b>describe</b> 18:7 67:6,15 78:3	<b>discounts</b> 62:2
<b>court</b> 4:10,17,22 5:17,19,22 31:3	<b>day</b> 72:14	<b>description</b> 34:4 54:8	<b>discuss</b> 17:4
<b>creative</b> 41:5	<b>deal</b> 33:2,3,5	<b>design</b> 8:23 84:18	<b>discussed</b> 60:24
<b>crew</b> 47:20,21 48:2 64:3 81:18	<b>decide</b> 32:12,15	<b>detail</b> 38:1	<b>District</b> 4:10
	<b>decision</b> 53:5 73:14, 15,16	<b>details</b> 7:19	<b>document</b> 23:6,9,12,18 49:4 54:3



Joseph Glonek  
August 29, 2025

57:7 <b>documentation</b> 49:11 55:9 <b>documents</b> 46:1,5,9 57:2 <b>doing</b> 6:6 7:6 9:5, 8 10:11 40:9 44:12 72:9 <b>double</b> 38:16 39:3, 20 52:14 <b>drag</b> 65:1 <b>dredge</b> 41:16 43:19, 21 44:3 79:13,23 80:5,11,17 <b>Drew</b> 8:18,22 9:2, 13 10:4,6,14 14:4,8 74:15 <b>drilled</b> 76:17 <b>driving</b> 35:6,22 72:19 <b>due</b> 14:5 <b>duly</b> 5:11	49:20 51:24 56:17 64:12 67:25 76:18 79:1 80:16 <b>else's</b> 16:5 <b>email</b> 17:1,3,4,8, 13 <b>emails</b> 16:25 <b>employee</b> 58:23 61:17, 20,23 62:12 <b>employees</b> 57:24 58:7,9 80:25 81:9 <b>end</b> 9:23 44:19, 20,21,23 72:6 78:5 <b>ends</b> 57:14 <b>ensure</b> 56:23 <b>enter</b> 4:22 <b>entire</b> 67:7 <b>entirely</b> 81:21 <b>entities</b> 26:3 79:25 <b>envelope</b> 79:3 <b>equipment</b> 32:22,23 <b>equipped</b> 39:19 <b>estimate</b> 26:8 <b>evade</b> 20:14 <b>event</b> 25:14 <b>eventually</b> 35:15	<b>everybody</b> 13:12 40:10 45:13 66:10 <b>exact</b> 58:25 72:10 <b>exactly</b> 34:5 72:14 <b>EXAMINATION</b> 5:12 <b>exchange</b> 17:8 <b>excused</b> 86:11 <b>exhibit</b> 23:3,6 41:11,13 46:25 53:14 71:2 76:3 78:13 <b>expect</b> 73:3 <b>expedited</b> 86:7 <b>expensive</b> 35:25 <b>explain</b> 21:15 <b>explained</b> 21:12 <b>express</b> 19:8,12 <b>extended</b> 47:4 <b>extends</b> 77:20 <b>extension</b> 13:6 14:4 20:13 <b>extent</b> 70:14,15 <b>extra</b> 76:20,22 77:2 <b>eyebolt</b> 49:19,21,22 50:12,20 51:2,6,9,13,	15,25 52:4 64:12,20 <b>eyebolts</b> 51:21 <hr/> <b>F</b> <hr/> <b>fabrication</b> 82:3 <b>fabricator</b> 82:20 <b>fact</b> 18:16 30:12, 17 40:1 <b>fair</b> 6:4,23 7:2 29:25 <b>familiar</b> 33:24 42:12 52:17 <b>familiarity</b> 52:20 <b>far</b> 49:1 52:23 60:14 69:21 72:6 81:19 84:25 85:10 <b>fiberglass</b> 81:18,23 <b>fiddle</b> 41:16 43:19, 21 44:14,16 45:1 64:8 <b>fight</b> 43:14,16 <b>figure</b> 48:6 <b>figuring</b> 33:4 <b>filed</b> 4:9 <b>final</b> 64:2 78:13 <b>financially</b> 4:17 <b>find</b> 14:19
<hr/> <b>E</b> <hr/> <b>earlier</b> 59:22 60:24 64:11 65:24 66:10 68:1 <b>easier</b> 48:17 <b>Edward</b> 5:5 <b>either</b> 18:25 34:7 40:23 44:19			

Joseph Glonek  
August 29, 2025

<b>fine</b> 52:12,13	<b>Florida</b> 4:10 52:18, 22 53:3	<b>frustrated</b> 19:14	39:16 40:11, 17 62:16
<b>finished</b> 50:6,19 51:5	55:19 74:24	<b>frustration</b> 19:8,12	65:22
<b>fire</b> 82:17	75:8	<b>fully</b> 50:10 51:11	<b>gesture</b> 6:1
<b>firm</b> 5:5	<b>flowing</b> 65:21	52:3,24 56:7	<b>gestures</b> 5:24
<b>first</b> 9:5,7 46:25	<b>follows</b> 5:11	<b>functioning</b> 59:5	<b>getting</b> 33:4 46:15
51:1 53:23	<b>foot</b> 28:25		<b>gift</b> 25:11,12
66:24	<b>forget</b> 81:11	<b>G</b>	29:25 30:2
<b>fish</b> 28:3 39:11	<b>form</b> 12:11,16	<b>gap</b> 78:7	<b>gifts</b> 30:25 31:6,9
43:10,15,16	13:11,18,22	<b>gather</b> 46:5,9	60:25 61:4, 11,14 62:1,3
68:7,10	14:6 20:19	<b>gave</b> 33:6	<b>gist</b> 18:18 72:11
69:25 70:1, 4,8,12,23	23:1 24:10	<b>gear</b> 25:14	<b>give</b> 26:12,19
<b>fished</b> 37:8,11,15, 20 38:5 39:2	31:24 38:8	<b>GEM</b> 4:8 5:1	<b>given</b> 7:5 34:21
69:3,16	40:8,15,19	7:17,21,22	36:21 61:15
<b>fishes</b> 66:9	41:1 45:20	17:24 18:2	<b>Glonek</b> 4:8 5:10,14
<b>fishing</b> 13:13 25:14	50:13 64:10	20:1,2,6,9, 12,17 22:9, 22 26:9	23:9 54:4
27:15,17	65:13 66:7, 25 67:9	31:13,17,19	57:21 63:11
37:19 39:6, 7,15 40:4, 10,24 41:3	70:21 73:11	35:25 45:25	86:10
42:17 43:6, 11 44:7,11	74:1 80:8	46:6 57:23	<b>goal</b> 70:4,7,8
45:23 47:3	<b>formed</b> 14:20	58:4 60:5,9	<b>goes</b> 10:23 27:18
61:8 67:8, 11,13,20,23	<b>forth</b> 55:19 65:18	61:1 71:22	45:1,2,10
69:20 70:3	<b>four</b> 47:6	85:15,21	49:20 55:19
<b>five</b> 10:9 57:11	<b>free</b> 25:14,16,21	<b>GEM's</b> 8:1,11 15:9	66:23 67:20
59:20 81:8	26:3 28:12	20:14 30:23	77:5,14
85:4	43:13 62:14, 15 65:17,21	<b>Gemlux</b> 15:22 16:1, 6,14 25:23	84:10
<b>fix</b> 62:9	<b>Friday</b> 15:4,5,6	26:1,2 29:9	<b>going</b> 17:9 18:16, 22 23:2,5
<b>fixed</b> 62:10 65:9	72:13	31:17 60:9	33:19 34:5,6
66:3	<b>friendly</b> 18:20 72:20	<b>general</b> 5:8 37:24	38:10 39:24
<b>flatbed</b> 55:24	<b>friends'</b> 62:9	40:4 44:7	40:6 41:11
	<b>front</b> 35:21 53:13	<b>generally</b> 36:20 37:23	42:5 43:18
		38:4,25	44:22 51:16, 20 57:14
			59:18 65:8,



Joseph Glonek  
August 29, 2025

16 72:6 73:1 76:3 77:18 <b>good</b> 4:1 5:14 6:7 73:7 <b>gooseneck</b> 55:24 <b>grand</b> 19:19 <b>grapevine</b> 8:15 <b>Gravely</b> 58:13 <b>greatest</b> 69:5 <b>Gretna</b> 4:12 <b>Grew</b> 44:12 <b>ground</b> 29:3 <b>grueling</b> 33:14 <b>guess</b> 8:9 21:23 28:2 50:14 51:7 52:6 54:18 72:3 74:8 77:23 83:8,21 <b>guessing</b> 52:12 <b>Gulf</b> 16:17 <b>guys</b> 13:13	22 42:5,18, 20,23 43:3, 14,20 44:15 45:16,18 49:16 50:23 63:23 64:2 65:2,8 66:18,23 67:19,24 68:4,17,23 70:17,24 71:3,7 79:17,19,20, 23 80:1,7,18 <b>hand</b> 5:24 <b>handful</b> 13:20 <b>handle</b> 33:1 57:9 <b>handled</b> 81:19 <b>handles</b> 56:21 <b>happen</b> 72:12 <b>harbor</b> 35:9 <b>hard</b> 8:5,7 <b>harder</b> 48:19 <b>hardtop</b> 35:17,19 <b>hardtops</b> 81:24 <b>hardware</b> 84:6,8 <b>Hatches</b> 27:11 <b>Hatoff</b> 4:14 <b>he'll</b> 62:4 <b>head</b> 5:24 16:19 19:13 41:10	49:8 76:10 <b>hear</b> 6:14,15 <b>heard</b> 8:15,17 42:25 85:10 <b>held</b> 4:11 <b>help</b> 26:14 62:4 <b>helped</b> 62:7 <b>Hey</b> 18:21 <b>highly</b> 40:6 <b>highway</b> 56:2 <b>hinges</b> 27:6,7,10 <b>hired</b> 83:3,5 <b>hobby</b> 29:6 <b>hold</b> 27:15 <b>holders</b> 27:6,12,24 <b>holds</b> 11:5 77:4 <b>hole</b> 76:11,14,17, 24 <b>holes</b> 77:14 <b>Hollister</b> 5:1 <b>home</b> 72:19 <b>honest</b> 10:11 <b>honestly</b> 10:10 85:5 <b>hoping</b> 73:1	<b>hydraulic</b> 59:4,13 <b>hypothetical</b> 30:19,21 <b>hypotheticall</b> <b>y</b> 30:11 <hr/> <b>I</b> <hr/> <b>idea</b> 7:15,16,24 9:4 18:24 24:23 28:6 53:7 57:8 60:23 61:21, 25 73:23 81:4 <b>identificatio</b> <b>n</b> 23:7 <b>image</b> 76:6 84:13 <b>inboard</b> 38:10 66:22 <b>inch</b> 9:22 10:15, 20 11:8 12:15,21 13:6,17 14:1,4 20:13,17 21:10 24:1,8 25:5 37:17 77:23,24 <b>include</b> 49:11 <b>included</b> 20:13 21:16 <b>includes</b> 67:7 <b>including</b> 10:15 16:25 54:22 <b>indirectly</b> 27:25
<hr/> <b>H</b> <hr/> <b>half</b> 13:24 77:23, 24 <b>halyard</b> 27:22 28:17 37:5 39:22, 23 40:7,13, 18,22 41:2,			

Joseph Glonek  
August 29, 2025

<b>individuals</b> 58:11	<b>interchangeable</b> 43:4	48:17	24:18 25:22
<b>industry</b> 8:16	<b>interested</b> 4:17	<b>Joe</b> 63:11	26:22 28:19
<b>influence</b> 31:4 34:9	<b>interface</b> 32:6	<b>joined</b> 5:5	30:15 33:3
<b>influenced</b> 30:25	<b>internal</b> 37:3,4 84:8	<b>Joseph</b> 4:8 5:10 86:10	37:18 38:2
<b>informed</b> 9:13 14:7 20:12 21:23	<b>internally</b> 84:6	<hr/>	52:23 53:4,5
<b>infringe</b> 14:21,25 15:9 30:23 60:9	<b>interrupt</b> 6:10,11	<b>K</b> <hr/>	54:13,18,19, 25 55:4,14
<b>infringement</b> 60:5	<b>introduced</b> 85:3	<b>Karpanty</b> 5:7 16:21,24 17:5,16	58:25 59:17
<b>install</b> 9:19 10:21 13:6,25 16:13 22:16, 23 23:22 34:15,19 49:23 62:20 63:5,11	<b>involved</b> 16:9 47:23 55:3 67:11	<b>keep</b> 73:12 74:4,6	60:21 61:19, 22 73:2 74:7
<b>installed</b> 11:18 12:15, 21,25 16:16 22:13 24:21 25:3 32:22 62:19	<b>involvement</b> 55:5	<b>kind</b> 7:24 9:16 11:22 16:12 28:23 34:5 35:19 39:25 44:21 56:1 59:2 61:15 84:21	75:16 81:19
<b>installing</b> 16:9 21:11 24:16 34:23 36:3	<b>irrelevant</b> 30:6,7	<b>kinds</b> 49:22	83:22 84:18, 25 85:2,10
<b>installs</b> 32:24 63:4, 14,18	<b>ish</b> 15:18	<b>KISS</b> 73:12	<b>knowledge</b> 31:21 37:14 44:8 49:11 85:8
<b>instruction</b> 13:3 48:25	<b>issue</b> 14:5 17:14 20:9 22:2 59:13 74:19 85:9	<b>kit</b> 9:12 78:15	<b>knowledgeable</b> 58:24
<b>instructions</b> 49:12	<b>item</b> 54:7,8,21	<b>kits</b> 78:18 79:2,6	<b>Kyle</b> 58:14
<b>intend</b> 85:17,20	<b>items</b> 29:20 42:9	<b>knew</b> 72:23	<hr/>
<b>intended</b> 7:2	<hr/>	<b>knockouts</b> 42:10,19 43:7	<b>L</b> <hr/>
	<b>J</b> <hr/>	<b>know</b> 7:9,18,20,25 8:1,4,5,14 9:6,12 11:11,14 12:12,24 13:9,14 14:12,18 15:23 16:7,8 18:10,25	<b>Lam</b> 5:8 6:15 46:4
	<b>Jersey</b> 4:12 39:9,17 46:12,18 47:13,17,25 48:11,24 56:8,17 62:20 71:11 75:15 81:2, 6,10,17		<b>lands</b> 66:19
	<b>job</b> 6:7 32:7		<b>larger</b> 35:10
			<b>latest</b> 69:5
			<b>lay</b> 67:18
			<b>lead</b> 83:8,9,12,16
			<b>leave</b> 75:24
			<b>left</b> 42:9
			<b>Legal</b> 4:15,18
			<b>life</b> 44:12
			<b>lights</b> 34:6



Joseph Glonek  
August 29, 2025

<b>likes</b> 66:11	<b>LLC</b> 4:8 5:1,2	<b>looking</b> 35:18 57:3 60:15 84:12, 13	<b>manual</b> 48:25
<b>line</b> 27:17,20,22 37:5 39:22 40:7,13,24 41:2,4 42:17,18,20 43:3,11,12, 13,20 44:15, 17,18 45:10, 16,18 47:10 50:23 54:5, 21 65:8 67:20,23,24 70:17,24 71:3,7 79:17,20,23 80:1,7,16,18	<b>located</b> 4:12	<b>looks</b> 76:9 78:5	<b>Marine</b> 4:9 5:4,6 7:21 17:19, 22 31:15 46:6,12,17 48:24 53:6,9 56:17 61:5, 8,10 75:14 85:12,18
	<b>location</b> 75:9,12	<b>lot</b> 50:17,18 57:22 66:21 85:25	<b>Marine's</b> 75:11
	<b>locations</b> 69:10 79:15	<b>lower</b> 23:17 36:9	<b>mark</b> 23:2,5
	<b>lock</b> 66:23	<b>lucky</b> 39:14	<b>marked</b> 23:4,6 53:14
	<b>locking</b> 78:9 79:2	<b>lure</b> 44:22	<b>market</b> 43:8
	<b>Lockton</b> 5:3 6:15 8:24 12:11, 16,23 13:11, 18,22 14:6 20:19 23:1 24:10 31:24 38:8 40:8, 15,19 41:1,7 45:20 50:13 51:23 53:16, 22 54:1 64:10 65:13 66:7,25 67:9 70:21 73:11 74:1 80:8 86:5	<b>lurer</b> 70:17	<b>mate</b> 32:20
<b>line-by-line</b> 34:4		<b>lures</b> 70:18	<b>Matt</b> 15:3,7,13,17 16:4 20:22 21:19 22:5,8 25:11,17,25 26:9,11 29:8,24 30:2,13,17 31:1,6,9 36:5,22 37:1 58:2 61:1 71:10,14
<b>lines</b> 28:17 39:23 40:18,22 41:23 42:5, 23 43:1,6,14 45:21,23 49:16,20 63:23 64:2 65:2 66:12, 20 67:14,19 68:2,4,17,23 70:18	<b>lockup</b> 78:21,23	<b>M</b>	<b>matter</b> 4:8 32:5 39:25
	<b>lockups</b> 79:6	<b>made</b> 13:9 20:16 32:3 53:5 60:6 73:4	<b>Matthew</b> 8:20 20:21, 22 25:22
<b>list</b> 32:21	<b>long</b> 9:22 11:8 18:12 24:13, 16 26:6 44:11 83:19	<b>majority</b> 39:15 73:25 74:3	<b>Mcdowell</b> 8:18,22 10:4 14:4,8 33:6, 10,21 74:15
<b>listed</b> 34:10 54:7	<b>longer</b> 11:5 85:5	<b>make</b> 6:1 9:2 11:5 32:9 36:14 48:17,19 50:7 73:7, 14,15,16 77:11 81:24 83:14	<b>Mchale</b> 5:4,5
<b>listing</b> 24:3	<b>look</b> 9:21 15:15 35:9 46:25	<b>makes</b> 80:7	<b>mean</b> 8:8 12:2
<b>litigation</b> 17:16,19 20:6,10 31:14,18,21 59:24 60:13 85:11,14	<b>looked</b> 14:16 23:15 30:24 71:1	<b>Making</b> 83:13	
<b>little</b> 9:16,24 66:12 78:7		<b>man</b> 18:21 83:8, 9,12,16	
		<b>management</b> 33:2	

Joseph Glonek  
August 29, 2025

15:15 43:16 44:4,8 58:7 <b>Meaning</b> 45:23 65:2 71:17 <b>mechanism</b> 40:23 41:3 67:25 <b>mechanisms</b> 41:12 <b>Media</b> 57:14,19 <b>meeting</b> 75:18 <b>mention</b> 72:1 <b>mentioned</b> 10:6 11:8 12:3 33:21 34:25 35:24 <b>met</b> 75:19 <b>metal</b> 47:6,9 82:2 <b>method</b> 56:18 73:12 <b>microphones</b> 4:5 <b>middle</b> 9:24 23:20, 23 35:20 <b>mind</b> 38:22 41:9 <b>misstate</b> 38:2 <b>mm-hmm</b> 11:10 23:19 41:14 44:25 68:2 <b>model</b> 16:15 36:9, 10,14 <b>month</b> 17:12 <b>months</b> 46:3	<b>morning</b> 4:1 5:14 <b>mount</b> 28:13 35:14, 15 76:14,18, 21 80:4 <b>mounted</b> 7:18 8:5,7 21:21 35:22 38:13 66:18 79:14 <b>mounting</b> 80:5 <b>mounts</b> 8:3 <b>move</b> 12:7 65:15, 16,18 66:3, 12 83:5 <b>movement</b> 65:19,20,21 <b>moves</b> 11:22 <b>multiple</b> 38:6 46:14, 20 68:3,17, 19 69:24 70:2,18,24 <hr/> <b>N</b> <hr/> <b>name</b> 4:14 58:13, 14 <b>nature</b> 37:24 <b>necessarily</b> 70:23 <b>need</b> 62:3,10 67:25 76:22 <b>needed</b> 17:6 26:12 <b>negatives</b> 67:2 <b>never</b> 10:18 67:13	75:13,19 <b>nine</b> 23:16,20 76:4 84:3,4 <b>nods</b> 5:24 <b>nonverbal</b> 6:1 <b>note</b> 4:4 <b>nuh-uh's</b> 5:25 <b>number</b> 26:22 42:8 53:20 54:14 75:21,22 <b>numbered</b> 23:21 <b>numbers</b> 23:17 24:4 <b>nut</b> 78:5,9 <hr/> <b>O</b> <hr/> <b>Object</b> 12:11,16 13:11,18,22 14:6 20:19 23:1 24:10 31:24 38:8 40:8,15,19 41:1 45:20 50:13 64:10 66:7,25 67:9 70:21 73:11 74:1 <b>objection</b> 8:24 12:23 41:7 51:23 65:13 80:8 <b>objections</b> 6:14,16 <b>occasion</b> 6:19 <b>occurred</b> 71:10	<b>occurring</b> 39:17 <b>October</b> 15:18 21:1 <b>offer</b> 62:5 <b>offered</b> 29:11 62:1 <b>office</b> 33:1 75:22 <b>officially</b> 83:21 <b>okay</b> 5:21 6:13 7:13 18:2 21:25 28:23 29:16 31:5 36:10 37:25 38:3 40:11 42:4,7,19,25 45:8 46:3 53:15 54:1, 12 66:1 77:4 80:14 86:4,5 <b>older</b> 29:5 <b>one</b> 9:23 10:15, 20 11:8 12:15,21 13:1,6,17,25 14:4 20:13, 17 21:10,12 24:1,8 25:5 30:10 31:22 33:21 37:17 38:9 39:22 40:7,13 44:20,23 45:6 48:4,5, 8,9 49:7 50:16 51:4, 14 52:3 53:11,17,18 54:7,10 70:16,17 71:7 73:13 75:17 78:5
---	--	---	---



Joseph Glonek  
August 29, 2025

84:7,15 <b>open</b> 46:22 <b>operation</b> 64:23,25 66:21 <b>opinion</b> 30:9,15,20 34:19,21 <b>opinions</b> 14:20 <b>opposed</b> 52:14 <b>option</b> 51:8 <b>ordeal</b> 72:4 <b>order</b> 17:10 26:18 33:22,24 34:2,10,13, 14 46:11,13, 16 48:23 53:20 54:20 67:23 86:6 <b>ordered</b> 29:14 46:19 48:10 54:11, 17 56:23 57:3 <b>ordering</b> 55:2,6 <b>orders</b> 53:8 <b>orientation</b> 65:9 <b>outboard</b> 38:10 <b>outcome</b> 4:17 <b>outrigger</b> 8:4,13 9:14, 17 10:22,25 11:6 21:8 22:13,16,24 24:5 25:6,7 27:3,21	28:1,4,10,12 29:21 32:13 38:9,13 39:24 41:3, 16,19 43:14 44:3 45:19, 21 46:16 47:24 48:4 49:13,17 50:1,6,24 51:20 53:2 54:22 59:17 62:19 63:15, 16,19 64:14, 17 65:8,10, 15 66:3 67:7,15 68:4,14 76:5,15,19, 21,23 77:5, 14,21 78:1 79:14,15 <b>outriggers</b> 9:10,12 12:21 13:1, 25 16:10,12 21:6 23:22 24:17,20 25:4 26:4, 10,25 27:1, 5,8,13,25 28:15,18 30:13 32:10 34:19,22 35:14 36:5, 21,25 37:5, 9,12,15,17, 20 38:5 47:4,12,18 49:2 50:9, 11,19 51:5, 11 52:4,10, 12,13,17,21 53:10 54:11 55:2,20 56:7 62:10 63:4, 12,24 66:1, 17 67:17 68:25 73:25	74:3 <b>outside</b> 29:14 79:2 <b>owned</b> 68:8 <b>owner</b> 32:20 <b>owners</b> 13:4 32:16 <b>owns</b> 15:23 16:8 21:21,23 <hr/> <b>P</b> <hr/> <b>packing</b> 55:11,13,15 56:13 <b>page</b> 23:16,20,23 41:12,13 42:8 43:18 46:25 47:1 76:3 78:14 79:10 84:3,4 <b>pages</b> 47:3 <b>paid</b> 27:4 <b>Palm</b> 5:9 22:19 24:13 32:21, 23 33:25 34:2,7 36:4 46:5,8,12,17 47:13,16,25 48:11,24 52:18,21 53:2,9 54:19 56:17 61:23 62:20,24 63:2,14,18 68:8 74:23 75:8,15 80:22,23,25 81:9,20,24 82:10,13,21	83:1,20 <b>paraphrasing</b> 36:1 <b>part</b> 11:18 19:21, 22 24:4 28:11 32:7 40:21 54:13 78:18 <b>parties</b> 4:4 7:20 <b>parts</b> 17:6 27:2,3 34:13,14,15 55:3,8,25 56:23 62:9 67:10 <b>party</b> 4:16 <b>past</b> 17:3 68:11 <b>patent</b> 7:17,23 8:1, 11 10:17 14:5 21:21, 23 60:5,18, 19,22 74:19 85:9 <b>patents</b> 14:13,16,21 15:1,9 20:9, 14 22:1 30:23 60:9, 10 <b>path</b> 35:7 <b>pay</b> 26:24 29:16 <b>paying</b> 28:5 <b>people</b> 33:1 43:24 47:21,23 48:3,7 66:11 <b>percent</b> 13:23
--	---	---	---

Joseph Glonek  
August 29, 2025

<b>perfectly</b> 10:11	78:3	<b>problem</b> 12:8	<b>provide</b> 26:10
<b>performs</b> 69:12	<b>pieces</b> 8:19 47:7,9, 14,17 67:10	<b>problems</b> 58:25 59:2, 13	<b>provided</b> 28:11 29:20 30:13,18 31:6,10 62:11
<b>person</b> 48:8,9	77:13	<b>proceeding</b> 4:7,11	<b>provides</b> 61:19,22
<b>personal</b> 16:5 25:21 26:3 34:8 58:5,20 61:5,11,13 62:2 75:6,7	<b>pipe</b> 34:6	<b>proceedings</b> 4:23	<b>pull</b> 53:17
<b>personally</b> 26:1	<b>PL</b> 82:15,19	<b>procures</b> 32:23	<b>pulley</b> 8:3,12 9:1, 18 10:24 11:18,25 12:4,9 23:21,25 24:5,7,17,21 25:6,8 37:12,15,16, 21 38:6,12, 14,16,19 39:3,4,20,21 40:1,3,5,12 41:16 43:19, 22 44:3 48:10,13,18 49:12,15,19 50:20 51:9, 13,25 52:5, 8,11,14,15 54:22 59:8, 20 64:12,13, 16,19 65:7, 9,16,17 66:2,6,23,24 67:3 68:25 72:4 73:9 76:4,11,15 77:6,15,25 78:10 80:13, 14 83:23 84:4,22 85:8
<b>persuade</b> 31:14,18,22	<b>place</b> 4:3	<b>produced</b> 53:20	<b>pulleys</b> 7:18,23 8:2 10:21 12:14, 20,25 13:6, 25 14:21,25
<b>phenolic</b> 84:21	<b>plastic</b> 84:21	<b>product</b> 25:13 28:6 43:7 54:16	
<b>phone</b> 15:15 17:2, 13 18:5,6 74:21 75:21, 23	<b>please</b> 4:4,20 38:2	<b>production</b> 56:20,22 57:2 63:3,7, 8,12	
<b>phrase</b> 7:4	<b>point</b> 21:9 53:11 66:19 67:21 84:7	<b>products</b> 4:8 5:1 7:21,22 17:25 18:3 29:9,12 30:23 31:14, 17,18 35:24 36:3 42:13, 16 43:11 45:25 46:6 57:23 60:9, 16 61:1 62:7,17 85:15,21	
<b>physical</b> 75:12 84:1	<b>poles</b> 28:8 29:21	<b>Products'</b> 60:10	
<b>pick</b> 4:5 75:23	<b>popping</b> 35:19	<b>professional</b> 58:5,17,20	
<b>picture</b> 24:3,4,11 25:5	<b>post-covid</b> 10:12	<b>project</b> 29:6	
<b>pictured</b> 84:19	<b>pre</b> 10:13	<b>projects</b> 83:13,15	
<b>piece</b> 8:25 9:11, 15,17 10:15, 20 11:9,18 12:15,21 13:1,2,17 14:1,11 20:14,18 21:10,13,16 22:6 24:1 65:23 76:20, 22 77:2,9, 13,18,22	<b>pre-covid</b> 10:12	<b>properly</b> 59:5	
	<b>predominantly</b> 36:22	<b>pros</b> 66:14	
	<b>previous</b> 17:9		
	<b>previously</b> 23:4		
	<b>pricing</b> 61:12,15,18		
	<b>prior</b> 17:12 82:10		
	<b>private</b> 4:6		
	<b>probably</b> 9:5,22 15:14 17:12 19:10 25:2 50:14 52:16 69:2 74:5,22 81:8		



Joseph Glonek  
August 29, 2025

15:8 21:7,21 22:6,10,12, 16,23 25:4 37:1,2 49:22 66:19 67:14 68:20,22 71:10,15 72:2 73:5,25 74:4,13 76:6 80:17,19 84:11 <b>pulls</b> 43:12 <b>purchase</b> 32:10,13 51:20 53:8, 20 <b>purpose</b> 11:11 42:15 45:18 69:7 72:21 80:2, 6,7 <b>put</b> 7:8 26:18 42:17 44:22 49:6,7 50:1, 7 53:13 76:22 <b>puts</b> 19:23 51:15 <b>putting</b> 21:6	35:5 37:24 86:3 <b>quite</b> 74:25 <b>quotes</b> 33:3 <hr/> <b>R</b> <hr/> <b>reaction</b> 21:24 <b>read</b> 14:13 60:19 <b>real</b> 76:9 <b>realize</b> 72:5 <b>reason</b> 6:21 7:11 22:21 66:5 71:3 80:5 <b>recall</b> 16:16 21:3 58:1 62:7 68:14 71:18 72:10 74:18 81:1 <b>receive</b> 22:12 34:13 36:5,25 46:11,13 47:24 48:10, 23 55:8,9 78:17,23 79:1 <b>received</b> 25:10,16 26:2 28:5, 15,18 61:1,4 <b>receiving</b> 56:21 <b>recently</b> 23:15 68:11 <b>recommendatio ns</b> 32:9	<b>record</b> 4:2,4,21,23 5:23,24 6:3 7:6 57:11, 14,18 77:12 <b>recording</b> 4:3 <b>reel</b> 43:17 44:20, 23 45:9 <b>refer</b> 41:12 <b>referred</b> 78:21 <b>referring</b> 9:8 81:24 <b>refers</b> 54:21 <b>regarding</b> 8:2 20:17 <b>relate</b> 46:6 <b>related</b> 4:16 59:17 <b>relationship</b> 57:23 58:6 <b>relationships</b> 58:16,20 <b>relative</b> 18:16 43:11 65:10 84:14 <b>released</b> 69:25 <b>remember</b> 10:10 16:18 19:11 24:19 49:7,14 58:13 69:3 72:14 84:20 85:6 <b>remind</b> 53:16 <b>remote</b> 4:23 <b>remove</b> 73:24	<b>removed</b> 13:17 14:1 <b>repeat</b> 7:4 12:19 20:15 <b>rephrase</b> 51:17 63:17 80:10 <b>reporter</b> 4:18,22 5:22 31:3 <b>request</b> 13:5,10,16, 25 <b>requested</b> 53:2 <b>rescue</b> 82:17 <b>response</b> 26:16 <b>responsibilit ies</b> 83:11 <b>responsible</b> 56:19 64:1,7 <b>rest</b> 28:10 <b>restoring</b> 29:4 <b>retail</b> 28:7 <b>retain</b> 40:23 41:3 <b>retention</b> 27:22 64:8 <b>review</b> 50:6,9 <b>rigged</b> 28:19,21 <b>rigger</b> 43:1,3 67:24 <b>riggers</b> 54:14,20 66:13 <b>rigging</b> 78:15,17 79:1,6
<hr/> <b>Q</b> <hr/> <b>quantity</b> 54:10,13 <b>question</b> 6:12,16,19, 22,23,25 7:1,4 14:10 24:19 63:17 80:10 81:5 <b>questioned</b> 9:13 14:9 <b>questions</b> 33:17,18			

Joseph Glonek  
August 29, 2025

<b>right</b> 5:23 6:9 12:4 28:9 41:15 53:22 61:2 70:13, 19 76:2,23 78:14	<b>rubbing</b> 65:3	37:12 40:12 52:7,11 60:9 68:16 71:10 73:5 85:7	<b>served</b> 46:1
<b>right-hand</b> 23:17	<b>run</b> 28:3,17 42:18 43:6 45:21 49:20 50:23 63:25 80:18	<hr/> <b>s</b> <hr/>	<b>session</b> 57:22
<b>ring</b> 41:20 45:4, 8,10,15	<b>running</b> 64:1	<b>Sal</b> 58:14	<b>set</b> 21:5 50:16 53:23,25 55:2 63:16 66:13
<b>Robertson</b> 4:18	<b>runs</b> 44:15 80:14	<b>Sandra</b> 4:18	<b>setup</b> 39:21 45:9 62:24 63:2 66:13 68:4, 15 70:24
<b>rod</b> 27:6,12,24 43:17	<b>Rupp</b> 4:9 5:4,6 7:21 8:23 10:14 12:25 17:19,22 20:12 21:6 22:15,22,23 23:3,6,21,22 24:17,21 25:4 30:12 31:15 35:25 37:9,12,15, 20,21 38:5 39:3 42:8 46:6,11,17 47:1,2 48:14,23 51:21,25 52:24 53:6,9 54:10,14,20, 22 56:16 58:19,23 59:23 60:2, 5,6 61:5,8, 10,19,22 62:1 63:15 65:7 71:2 74:13 75:11, 14 78:18,24 79:2 83:23 85:12,18	<b>saying</b> 30:14	<b>ship</b> 48:14
<b>rods</b> 27:15,17		<b>says</b> 60:18 73:18	<b>shipment</b> 56:16
<b>role</b> 34:7 50:3 58:25 83:2, 4,7,17		<b>scheme</b> 19:19	<b>shipments</b> 78:18,24
<b>rollers</b> 37:3,4 44:15		<b>screw</b> 77:25	<b>shipped</b> 17:7 52:18, 21 55:12
<b>Ron</b> 5:6 16:20,24 17:5,8,11, 15,21 58:21 59:7,10,14, 16,19 61:12 62:3 75:16, 19,23		<b>screws</b> 76:23	<b>shipping</b> 56:21
<b>Ron's</b> 75:21		<b>second</b> 47:1 49:24 51:8 53:23, 25	<b>shop</b> 73:21 81:11, 23
<b>root</b> 37:5 49:16		<b>see</b> 24:5,8 25:8 35:10 41:17, 19 47:7 51:12 54:8 56:2 69:11 76:12 78:15 79:11 84:4	<b>show</b> 23:25 46:17 69:9 76:5,7
<b>rotate</b> 9:25 11:19, 21		<b>seeing</b> 67:16	<b>shown</b> 47:3 51:20 76:6
<b>rough</b> 86:6		<b>semi</b> 55:22	<b>side</b> 11:22,23 35:19 63:5 76:10
<b>route</b> 51:12	<b>Rupp's</b> 10:21 14:21, 25 15:8 20:17 22:6, 10,12 30:23	<b>sends</b> 54:20	<b>sides</b> 30:8
<b>routed</b> 27:21		<b>sensitive</b> 4:5	<b>similar</b> 23:12 43:7 54:3 56:3
		<b>separate</b> 48:12	<b>Simple</b> 73:13
		<b>separated</b> 65:5	<b>single</b> 38:19 39:4,
		<b>series</b> 47:6	



Joseph Glonek  
August 29, 2025

21 52:15	40:11,17	<b>started</b>	<b>subpoena</b>
54:16,21	62:16	9:5,7 10:11	46:1
71:3	<b>species</b>	74:12 80:23	<b>supervisor</b>
<b>sir</b>	70:1,10	81:7 83:1	50:4 81:12
22:20 24:23	<b>specific</b>	84:5	83:18,19,24
27:16 28:16	16:15 32:17	<b>state</b>	<b>supervisors</b>
29:7 35:2,5	36:11,13,14	4:20 6:20	81:16,20,21
68:13 75:20	38:1,22	<b>statement</b>	<b>supplied</b>
<b>sitting</b>	66:22 72:25	4:22 10:16	79:9
5:22 73:20	<b>specifically</b>	<b>States</b>	<b>Support</b>
<b>situation</b>	18:15 21:4	4:9 39:7,12,	4:15,19
51:24	25:20 33:2	17	<b>supposed</b>
<b>size</b>	63:15	<b>stayed</b>	56:25
51:20 71:6	<b>specifics</b>	83:13	<b>sure</b>
77:17	7:25 8:6,14	<b>stem</b>	41:5,18
<b>Slavin</b>	15:23	24:8 25:5	45:14 50:7
5:4	<b>spin</b>	37:17 83:25	53:11 54:5
<b>sleeping</b>	11:23 65:25	<b>stems</b>	73:7 77:11
35:11	<b>spins</b>	84:24 85:1,	81:21 83:13,
<b>sleeves</b>	65:20	3,7	14
78:7	<b>spoke</b>	<b>Stettinius</b>	<b>Sutton</b>
<b>slide</b>	16:23 17:11	5:1	18:4,13 20:1
48:22	22:22 65:23	<b>stop</b>	22:8 58:2
<b>slight</b>	71:22,24	30:14	71:23
19:12	<b>spoken</b>	<b>Stream</b>	<b>swear</b>
<b>slightly</b>	16:20 17:15,	16:17	4:23
19:10	18,21,24	<b>strictly</b>	<b>swivel</b>
<b>slip</b>	20:2,5,8	58:17	9:16,24,25
55:11,13,15	22:9 59:19,	<b>strike</b>	10:2 11:9,
56:13	23 60:1,4	12:13 25:19	12,14,18
<b>small</b>	61:12	34:17	12:1,3 13:2
36:19	<b>sports</b>	<b>strings</b>	15:10 20:13,
<b>smaller</b>	25:13	63:25	14,17 21:10,
35:13 36:23	<b>spot</b>	<b>stud</b>	13,16 22:5
<b>smoother</b>	7:9	9:23 78:8,11	24:1 65:23
64:23,25	<b>spreader</b>	<b>stuff</b>	66:2,6,16
66:21	28:14	19:23 32:3	73:5,9,15
<b>sort</b>	<b>stamp</b>	33:1 50:5	76:7,18
6:1 7:23	53:17	55:4 56:21	77:1,8,12,
40:23 55:9	<b>stamped</b>	59:22	18,21 78:3
58:5 67:25	53:19	<b>Stupid</b>	<b>swivel-able</b>
74:19	<b>standpoint</b>	73:13	67:3
<b>speak</b>	30:19,21	<b>style</b>	<b>swivels</b>
18:2,12	<b>start</b>	13:12 35:3	73:17,22,24
58:21	44:23 58:9	<b>styles</b>	74:4,6,12
<b>speaking</b>	80:21	70:2	78:8
30:11 38:4			

Joseph Glonek  
August 29, 2025

<b>sworn</b> 5:11	<b>teaser</b> 40:24 41:4, 19 44:17,18 45:4,8,10,15 68:19,22 70:18 79:13, 22 80:4,11, 16	70:18	74:9,18
<b>synonymous</b> 36:17		<b>think</b> 16:18 28:9 71:5 83:22	<b>tone</b> 40:1
<b>system</b> 9:1 11:19 28:4,10,12 46:16 67:7		<b>thinking</b> 27:4 38:23	<b>top</b> 16:19 19:13 23:20,23 35:17,22 41:10,15 42:9 49:8 66:19 78:8, 14 84:15,19
<b>T</b>	<b>teaser/dredge</b> 79:11	<b>third</b> 47:1	
<b>T-SHIRT</b> 25:13	<b>technology</b> 69:5	<b>thought</b> 85:24 86:1	<b>total</b> 81:2,3
<b>Taft</b> 5:1	<b>tell</b> 10:14 19:5 24:9,11 25:4 32:25 33:18 43:23 51:17	<b>thread</b> 10:24 78:6	<b>tough</b> 7:9
<b>take</b> 4:3 26:17 48:21 57:11	<b>temporary</b> 53:19	<b>threads</b> 9:23	<b>tournament</b> 69:23 70:3, 5,7,9
<b>taken</b> 5:15,22 57:16 62:5	<b>ten</b> 69:2 83:24	<b>three</b> 26:8 39:23 40:1,3,5 42:9 50:22	<b>tournaments</b> 69:14,17 70:2
<b>takes</b> 64:3	<b>tension</b> 27:21 43:12	<b>throw</b> 74:8,9	<b>towers</b> 5:9 22:19 24:14 32:21, 23 33:25 34:3,8 36:4 46:5,9,12,18 47:13,16,25 48:11,24 52:18,21 53:2,9 54:19 55:25 56:18 61:24 62:20, 24 63:2,14, 18 68:8 74:24 75:8, 15 80:22,23 81:1,10,20, 25 82:3,11, 14,22 83:1, 20
<b>taking</b> 30:8	<b>term</b> 42:22,25	<b>tickets</b> 25:13,14	
<b>talk</b> 6:7 18:15 19:1 21:9 59:14 72:22 74:15 85:17, 20	<b>testified</b> 5:11,19 30:22 51:4	<b>tilt</b> 76:10	
<b>talked</b> 10:1 15:12 58:1 59:10 64:11 68:1 76:5	<b>testify</b> 7:11	<b>time</b> 4:21 15:12, 17 16:23 17:9,10 48:5,8,9 57:6,13,17 74:25 75:17 83:6 86:8	
<b>talking</b> 38:23,24 39:16 84:1, 15	<b>testimony</b> 30:3,25 31:7	<b>times</b> 5:25 32:15	
<b>tapped</b> 76:17	<b>text</b> 17:2	<b>title</b> 59:1	
<b>target</b> 83:13	<b>thing</b> 33:21 44:4,9 49:5 67:4 73:13	<b>today</b> 7:10,11,14 30:3,22 31:7 82:24 85:18, 21,24	
<b>team</b> 63:4 69:18 82:2	<b>things</b> 8:17 13:14 18:22 19:19 29:14,17,19 35:11 38:24 39:16 45:13 56:21 61:13, 16 66:9 68:20 69:24	<b>today's</b> 5:21 17:22, 25 18:3 20:2 60:2	<b>trailer</b> 55:18,21,22, 23,24 56:2, 6,12,18
		<b>told</b> 14:24 62:3	<b>transcript</b> 86:7



Joseph Glonek  
August 29, 2025

<b>transport</b> 55:14,16,25 56:7	<b>typically</b> 32:14 41:24 44:17 45:6 49:18 59:4, 12,16 62:13 63:9 71:8 74:2 76:1 79:8	52:20 60:23 <b>Vaguely</b> 52:19	<b>W</b>
<b>travelling</b> 39:13		<b>value</b> 28:6 29:20	<b>walk</b> 35:8
<b>triple</b> 38:14 39:3, 20 40:12 52:14		<b>various</b> 60:15 79:15	<b>walkaround</b> 28:25 35:1, 3,12,15 36:11,14,19, 23
<b>troubleshoot</b> 59:6	<b>U</b>	<b>vary</b> 69:24	<b>want</b> 32:17,22 66:6 70:12, 16 71:7 73:7,18,19 76:21
<b>troubleshooti ng</b> 59:12	<b>U.S.</b> 4:15,18	<b>verify</b> 57:3	<b>wanted</b> 11:24
<b>truck</b> 55:18 56:4	<b>uh-huh's</b> 5:25	<b>versus</b> 4:9 63:2	<b>water</b> 27:18 44:22 45:2,11 67:21 68:6 70:13
<b>trucks</b> 82:17	<b>uhmm</b> 55:12	<b>vertical</b> 84:14	<b>way</b> 7:5 8:10 11:19 25:8 30:3,25 31:7,10 40:4 48:13 84:23 85:1,12,15
<b>truthfully</b> 7:11 33:17	<b>understand</b> 6:21,22 7:7, 9,22 19:18, 24 30:24	<b>video</b> 4:3	<b>ways</b> 50:22
<b>try</b> 6:10,11	<b>Understandabl e</b> 32:4	<b>video- recorded</b> 4:7	<b>website</b> 23:14
<b>trying</b> 7:8 17:14 48:6 70:11, 22	<b>understanding</b> 7:13 8:11 14:3 15:25 16:3 44:2 56:13 64:24 73:8 79:5	<b>videographer</b> 4:1,15 57:13,17 86:8	<b>week</b> 17:3 18:14 71:22,24
<b>tube</b> 10:25 24:12 25:7 48:22 79:16	<b>understood</b> 6:17 7:1	<b>videotaped</b> 86:9	<b>welder</b> 82:20 83:3,5
<b>tubes</b> 11:5 77:5	<b>unit</b> 57:15,19 59:5	<b>view</b> 31:10 85:11, 14	<b>welding</b> 82:5,21
<b>turn</b> 23:16 41:12	<b>United</b> 4:9 39:7,12, 17	<b>Viking</b> 4:11 5:9 15:22 35:10 46:1,4 53:9, 20 61:24 63:3,5 68:7, 8,12 69:18, 20 80:21 81:21	<b>Wellcraft</b> 28:25
<b>two</b> 10:7 11:5 18:23 40:18 46:3 47:3 75:5 77:13 78:6 79:25 84:14	<b>universal</b> 36:12	<b>Viking's</b> 69:4,7	<b>went</b> 9:17 10:18 85:25
<b>type</b> 17:1 25:10 36:11,15,22 48:25 55:22	<b>unpacking</b> 56:19	<b>visit</b> 75:8	
<b>types</b> 36:4 57:1	<b>v</b>	<b>visited</b> 75:11,14	
	<b>vague</b> 7:15,16	<b>voicemail</b> 75:25	

U.S. Legal Support | [www.uslegalsupport.com](http://www.uslegalsupport.com) 19